

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

Plaintiff,

vs.

JOSEPH D. GIAMPA, FREDERICK T.
GIAMPA, ADVANCED SPINE CENTERS,
INC. d/b/a FIRST SPINE & REHAB, FUTURE
MANAGEMENT CORPORATION,
EDWARD KENNEDY, BRIAN J. CULLINEY
and JENNIFER McCONNELL

Defendants.

CIVIL ACTION NO.: 05-11693 RCL

PLAINTIFF'S SECOND AMENDED COMPLAINT

The plaintiff, Encompass Insurance Company of Massachusetts (hereinafter

“Encompass”) by its attorneys, Smith & Brink, P.C., alleges as follows:

TABLE OF CONTENTS

I.	INTRODUCTION.....	3
II.	THE PARTIES	4
III.	JURISDICTION AND VENUE	5
IV.	FACTUAL ALLEGATIONS REGARDING CREATION AND ACTIVITIES OF FUTURE MANAGEMENT	5
V.	SPECIFIC ALLEGATIONS OF WRONGFUL CONDUCT	7
	1. Culliney Conduct	7
	2. McConnell Conduct.....	8
	3. Edward Kennedy Conduct.....	9
	4. Joseph Giampa Conduct	10
	5. Frederick Giampa Conduct.....	11
VI.	SPECIFIC ALLEGATIONS REGARDING PROHIBITED REFERRAL ACTIVITY.....	11
VII.	FACTUAL ALLEGATIONS REGARDING FALSE MEDICAL BILLING SCHEME	14
	1. Recipe of First Spine Treatment Chart.....	16
	2. CPT Codes Chart	20
	3. CPT Upcoding Initial Exam Chart.....	22
	4. CPT Upcoding Re-Exam Chart	25
	5. Medical Bills Exceed Tort Threshold Chart.....	30
	6. Unwarranted Spinal Manipulation Chart.....	36
	7. Unwarranted and Excessive First Spine Patient Visits Chart	41
	8. Unwarranted and Excessive Heat Treatments Chart.....	45
	9. Unwarranted and Excessive EMS Treatments Chart.....	50
	10. Unwarranted and Excessive Traction Treatments Chart.....	54

11. Fraudulent Re-Exams Chart.....	55
A. Exemplar Claims.....	59
VIII. SPECIFIC ALLEGATIONS OF MAIL FRAUD RACKETEERING ACTIVITY	134
IX. SPECIFIC ALLEGATIONS REGARDING GIAMPA CHIROPRACTORS AND KENNEDY BROTHERS CONTROL OF THE CORPORATE ENTERPRISES	137
X. FRAUDULENT CONCEALMENT.....	140
XI. DAMAGES.....	140
XII. CAUSES OF ACTION	142
COUNT I Violations of 18 U.S.C. §1962(c).....	142
COUNT II Innocent Victim Enterprise Violation of 18 U.S.C. §1962(c)	144
COUNT III Violation of 18 U.S.C. § 1962(d).....	145
COUNT IV Mass. Gen. Laws Ch. 93A	146
COUNT V Civil Conspiracy	147
COUNT VI Fraud	148
COUNT VII Intentional Interference With Advantageous Business And Contractual Relationships	149
XIII. DEMAND FOR RELIEF.....	150

I. INTRODUCTION

1. This is a case about chiropractors, Frederick and Joseph Giampa (hereinafter “Giampa chiropractors”), working in concert with their employees (Chiropractors Brian Culliney and Jennifer McConnell) and other business associates (Edward Kennedy and James Kennedy), who engaged in a scheme to defraud Encompass Insurance Company of Massachusetts (hereinafter “Encompass”) by creating and submitting false, fraudulent and inflated chiropractic invoices containing excessive charges (hereinafter “false medical documentation”) through the U.S. Mail and demanding payment for excessive and/or non-existent and/or unwarranted chiropractic treatment through their chiropractic clinic First Spine & Rehab.

2. By this pleading, Encompass brings claims against the named defendants seeking injunctive relief and money damages for (1) violations of the Federal Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §1962(c)-(d), (2) violations of Mass. Gen. Laws ch. 93A, §11; (3) civil conspiracy; (4) fraud; and (5) intentional interference with advantageous business relationships.

3. All of the acts and omissions of the defendants described throughout this Complaint were undertaken intentionally.

4. The defendants’ insurance fraud scheme was designed to and did, in fact, result in the payment of automobile insurance contract proceeds from Encompass to the defendants.

5. In each claim detailed throughout this Complaint, an Encompass automobile insurance contract was the platform upon which defendants perpetrated their fraudulent scheme.

6. The defendants knew that the patients referred to in this Complaint were insured pursuant to automobile insurance policies issued by Encompass.

II. THE PARTIES

A. Plaintiff

7. Encompass Insurance Company of Massachusetts is a Massachusetts corporation duly authorized to carry on and do business in the Commonwealth of Massachusetts.

8. Prior to 2005, Encompass wrote Massachusetts automobile policies through Boston Old Colony Insurance Company.

9. Boston Old Colony was at all relevant times a Massachusetts corporation duly authorized to carry on and do business in the Commonwealth of Massachusetts.

10. At all relevant times and in connection with all of the claims detailed herein, Encompass and Boston Old Colony were writing Encompass risk policies and will be referred to throughout the remainder of this Complaint as “Encompass.”

B. Defendants

11. At all relevant times, Frederick Giampa was a resident of the Commonwealth of Massachusetts.

12. At all relevant times, Joseph Giampa was a resident of the Commonwealth of Massachusetts.

13. At all relevant times, Edward Kennedy was a resident of the Commonwealth of Massachusetts.

14. Advanced Spine Centers, Inc. d/b/a First Spine & Rehab (hereinafter “First Spine”), is a Massachusetts corporation duly licensed to carry on the business of

chiropractic services with its principal place of business (for purposes of this Complaint) located at 410 School Street, Lowell, Massachusetts.

15. Future Management Corporation (hereinafter "Future Management") is a Massachusetts corporation with a principal office address of 73 Princeton Street, North Chelmsford, Massachusetts. Future Management owns a chain of chiropractic offices (including First Spine) in various states, many of which are in Massachusetts.

16. Brian Culliney is a resident of the Commonwealth of Massachusetts, who at all relevant times practiced chiropractic at First Spine.

17. Jennifer McConnell is a resident of the Commonwealth of Massachusetts, who at all relevant times practiced chiropractic at First Spine.

III. JURISDICTION AND VENUE

18. Jurisdiction over this action is conferred upon this Court by 28 U.S.C. §§1331, 18 U.S.C. §1962(c)-(d), 18 U.S.C. §1964. Supplemental jurisdiction over the state law claims is proper under 28 U.S.C. §1367.

19. The vast majority of the wrongful acts known to Encompass as alleged herein with particularity were carried out within the Commonwealth of Massachusetts.

20. Venue is proper under 28 U.S.C. §1391(c).

IV. FACTUAL ALLEGATIONS REGARDING CREATION AND ACTIVITIES OF FUTURE MANAGEMENT

21. James Kennedy is the brother of Edward Kennedy.

22. Edward Kennedy and James Kennedy (hereinafter collectively referred to as "the Kennedy Brothers") are the sole shareholders, officers and directors of Robert T. Kennedy, Inc. d/b/a Kennedy Professional Supply ("Kennedy Supply"), a business

engaged in the sale of durable medical goods to chiropractic clinics and other similarly situated enterprises.

23. On May 19, 2005, James Kennedy filed a Chapter 11 Bankruptcy Petition (#05-43405) in the United States Bankruptcy Court, District of Massachusetts (Worcester).

24. Encompass reserves its right to seek relief from the Automatic Stay, 11 U.S.C. §362, in the bankruptcy forum and move to add James Kennedy as a party to this action.

25. Through Kennedy Supply, Edward Kennedy developed substantial business contacts in the chiropractic industry.

26. Thereafter, Edward Kennedy decided to open medical offices to provide chiropractic services to the public.

27. Edward Kennedy contacted Joseph Giampa, a longtime friend who Edward Kennedy knew to be a licensed chiropractor in Massachusetts, for the purpose of becoming a partner in the new business venture.

28. The new business, Future Management Corporation was formally organized in February 1997.

29. The Giampa chiropractors and Kennedy Brothers own and/or operate in excess of forty (40) chiropractic and physical therapy clinics (hereinafter collectively referred to as "Giampa clinics").

30. At all relevant times, Future Management was comprised of shareholders Edward Kennedy, James Kennedy, Joseph Giampa, and Frederick Giampa.

31. The creation of Future Management was also intended to benefit Kennedy Supply's business, as Kennedy Supply was to be Future Management's primary distributor of medical and chiropractic equipment and supplies.

32. By September 2003, Future Management expanded from one (1) office in Lawrence, Massachusetts to over forty (40) offices throughout New England and across the United States, including Florida, Oklahoma, Connecticut, Rhode Island, South Carolina, New Hampshire, Pennsylvania, Illinois and Virginia.

33. In addition, Edward Kennedy and James Kennedy formed First Health, a sister corporation to Kennedy Supply, for the purpose of managing and handling various aspects of Kennedy Supply's business including, but not limited to, administering Kennedy Supply's payroll.

V. SPECIFIC ALLEGATIONS OF WRONGFUL CONDUCT

1. Culliney Conduct

34. In addition to the wrongful conduct alleged throughout this Complaint against the defendants collectively, as Future Management grew, the principals created a hierarchy by appointing their top lieutenants as "Team Leaders."

35. Defendant Brian Culliney is a "Team Leader" and one of the highest paid employees of Future Management.

36. By virtue of his status as a Team Leader, defendant Culliney possessed supervisory oversight of the First Spine Lowell clinic as well as other Giampa/Kennedy clinics in Massachusetts.

37. As part of his function as a Team Leader and marketer for the Lowell First Spine clinic, it was Culliney's practice to issue cold-call letters soliciting patients for First Spine.

38. Upon presentation to the clinic, recruited patients receive instruction regarding the processing of their claim through the insurance company, and that the patient would be paid if s/he pursued a claim with an attorney.

39. Culliney and McConnell purportedly provided chiropractic treatment to 163 of the 196 patients contained in Exhibits 1 and 3.

40. Culliney has boasted to "treating" as many as two hundred (200) patients in a single First Spine Lowell clinic business day.

41. In connection with those patients so identified in Chart 3 annexed hereto, Culliney was a signatory on the false medical documentation created and submitted by defendants.

2. McConnell Conduct

42. In addition to the wrongful conduct alleged throughout this Complaint against the defendants collectively, McConnell is listed with the Board of Registration of Chiropractors as the Chiropractor of Record for the First Spine Clinic.

43. By virtue of her status as the Chiropractor of Record, McConnell had oversight regarding all treatment allegedly provided to First Spine Lowell clinic patients including all patients identified in Exhibits 1 and 3.

44. McConnell administered and/or directed the treatment for the patients and was a signatory on the false medical documentation created and submitted by the defendants in connection with those patients so identified in the table annexed at Tab 3.

3. Edward Kennedy Conduct

45. In addition to the wrongful conduct alleged throughout this Complaint against the defendants collectively, at all material times, Edward Kennedy was the President of Future Management Corporation.

46. As President, Edward Kennedy had supervisory oversight of the First Spine Lowell clinic.

47. Edward Kennedy was responsible for personnel decisions including hiring, firing and training of First Spine medical and non-medical staff.

48. Edward Kennedy oversaw chiropractor "recruitment" and hiring for Future Management.

49. Edward Kennedy implemented the standard Giampa Clinic recipe of treatment that called for all auto accident patients to be seen four (4) times per week during the first two weeks of treatment and three (3) times per week during the following three weeks, without exception or regard to the individual needs (or lack thereof) of the patient.

50. This Giampa clinic recipe of treatment imposed by Edward Kennedy and the Giampa chiropractors, and executed by, among others, Culliney and McConnell constitutes excessive, over utilization of chiropractic treatment.

51. Edward Kennedy continuously defrauded Encompass through the creation of false medical documentation submitted to Encompass with the intent to illegally obtain insurance payments.

52. Edward Kennedy, together with the Giampa chiropractors, was a principal of Future Management and oversaw and directed the pre-ordained medical protocol and recipe of treatment that was implemented at First Spine.

53. Edward Kennedy is one of the business principals who oversaw and/or directed the medical billing fraud scheme implemented through Future Management Corporation.

4. Joseph Giampa Conduct

54. In addition to the wrongful conduct alleged throughout this Complaint against the defendants collectively, Joseph Giampa continuously defrauded Encompass through the creation of false medical documentation submitted to Encompass with the intent to illegally obtain insurance payments.

55. Joseph Giampa is one of the business principals who oversaw and/or directed the pre-ordained medical protocol and recipe of treatment that was implemented at First Spine.

56. Joseph Giampa is one of the business principals who oversaw and/or directed the medical billing fraud scheme implemented through Future Management Corporation.

57. Upon information and belief, Joseph Giampa was at all material times, listed with the Board of Registration of Chiropractors as the Chiropractor of Record for the First Spine Clinic.

58. As Chiropractor of Record, Joseph Giampa had oversight regarding all treatment allegedly provided to First Spine Lowell clinic patients including all patients identified in Exhibits 1 and 3.

5. Frederick Giampa Conduct

59. In addition to the wrongful conduct alleged throughout this Complaint against the defendants collectively, Frederick Giampa continuously defrauded Encompass through the creation of false medical documentation submitted to Encompass with the intent to illegally obtain insurance payments.

60. Frederick Giampa is one of the business principals who oversaw and/or directed the pre-ordained medical protocol and recipe of treatment that was implemented at First Spine.

61. Frederick Giampa is one of the business principals who oversaw and/or directed the medical billing fraud scheme implemented through Future Management Corporation.

62. Frederick Giampa personally delivered cash to personal injury attorneys in connection with First Spine patients.

VI. SPECIFIC ALLEGATIONS REGARDING PROHIBITED REFERRAL ACTIVITY

63. The Massachusetts legislature criminalized the use of “runners” at Mass. Gen. Laws ch. 266, §111C.

64. The Massachusetts Code of Regulations 233 C.M.R. 4.12, governing chiropractors, prohibits referral fees.

65. Kennedy Supply Corporation enabled Future Management to fraudulently borrow hundreds of thousands of dollars from various lending entities under the guise that Future Management Corporation was “purchasing” chiropractic equipment from Kennedy Supply.

66. Future Management also funneled money from Kennedy Supply to pay for Future Management's payment of illegal runner referrals to secure patients (including Encompass claimants) for the Giampa clinics (including First Spine).

67. James Kennedy and Edward Kennedy were the alter egos of Kennedy Supply and were directly responsible for the payment of illegal runner referral payments to secure patients at the Giampa clinics.

68. In Future Management parlance, illegal runner referral payments were referred to as "marketing," "promotion" and/or "bonus" expenses.

69. Payment of improper patient referral fees were not documented in Future Management medical records or invoices.

70. Stephanie Vinas was a runner employed by First Spine.

71. Vinas is Brian Culliney's former patient who is paid to recruit patients for the Lowell First Spine Clinic.

72. In addition to Vinas, other improper, unfair and deceptive referral fees were made by the defendants in the form of "marketing" and/or "promotion" payments through Future Management payroll (and off-payroll) accounts payable to employees and outsiders for referral of patients to Giampa/Kennedy clinics including the Lowell First Spine Clinic.

73. In violation of Mass. Gen. Laws ch. 266, §111C and 233 C.M.R. 4.12, the defendants made illegal referral payments to third parties (i.e., "runners") in connection with Encompass claimants/First Spine patients.

74. Illegal patient referral fees were paid at a rate of \$100.00 per patient.

75. If a claimant also agreed to submit to attorney representation referred by First Spine to pursue his/her claim, the referring party (i.e., runner) was paid an additional \$100.00.

76. From time to time, Cellinet Morton was an "employee" of Future Management, who worked with Fred Giampa delivering cash to personal injury attorneys in connection with the referral of First Spine patients.

77. The payment of runner kickbacks represents an intentionally unfair and deceptive business practice.

78. Payment of improper referral fees by the defendants was not disclosed to Encompass.

79. None of the chiropractic records and/or bills created by defendants and caused to be mailed via the U.S. Mail to Encompass referenced the payment of secret runner referral kickbacks.

80. The payment of runner kickbacks (i.e. referral fees) encourages fraudulent automobile insurance claims.

81. Runner kickbacks falsely inflated the chiropractic invoices First Spine submitted to Encompass as alleged herein at Exhibits 1 and 3.

82. In addition to the particularized factual support plead throughout this Complaint and contained in the attached tables and charts (Tabs 1-3) incorporated by reference as if set forth in their entirety herein, the defendants provided patients with cash or cash-equivalent inducements in connection with treatment allegedly provided at First Spine in violation of 233 C.M.R. 4.12, including the following Encompass claimants:

<u>CLAIM NO.</u>	<u>CLAIMANT/PATIENT</u>	<u>DATE OF LOSS</u>
03526598	Sokhira Yang	05/06/05
03528572	Viengkhone Khammanivong	06/18/05

<u>CLAIM NO.</u>	<u>CLAIMANT/PATIENT</u>	<u>DATE OF LOSS</u>
03544179	Marina Non	07/14/04
03544179	Mith Non	07/14/04
03544179	Rada Non	07/14/04
03544179	Savet Non	07/14/04
03547961	Jennifer Hell	09/04/04
*Z3022185	Lim Seng	01/17/06
*03584069	Kimbum Kam	10/15/05
*Z3022185	Sarunn Vorn	01/17/06
03549524	Thorng Ream	10/02/04

83. The co-conspirator chiropractors, including Culliney and McConnell would pay for improper patient inducements and be reimbursed by Future Management accounting personnel and/or would charge such items to Future Management issued credit cards.

VII. FACTUAL ALLEGATIONS REGARDING FALSE MEDICAL BILLING SCHEME

84. The defendants successfully executed their fraudulent scheme through the Giampa clinics (including First Spine) they created, operated and controlled.

85. The medical documentation created and submitted by First Spine under the direction, supervision and control of the defendants, Frederick Giampa, Joseph Giampa, Edward Kennedy, Brian Culliney and Jennifer McConnell, was created in connection with reported motor vehicle accidents and shared most -- if not all -- of the following common denominators:

- ♦ patients complained only of soft tissue injury;
- ♦ multiple claimants of varying age in the insured vehicle with each claimant receiving substantially identical diagnoses and treatment;

* Demonstrates defendants' continued defiance of applicable law and regulation even after the commencement of the case at bar in August, 2005.

- ♦ the patients routinely did not receive treatment at any other non-affiliated medical facility;
- ♦ First Spine routinely treated the same patient(s) for multiple accidents. In some cases reference to prior treatment at First Spine (or previous automobile accidents) was omitted from the patients' medical record;
- ♦ the vehicles involved in the reported accidents sustained little or no damage, even though First Spine billed thousands of dollars in treatment;
- ♦ patients advanced minimal (and in most claims no) lost wage claims despite the fact that they purportedly received disability ratings (regardless of the patient's age or occupation) from First Spine;
- ♦ bills for treatment invariably exceeded bills submitted by other chiropractic facilities providing treatment to accident victims in the same geographic area; and
- ♦ defendants' medical documentation indicated that nearly all First Spine patients/Encompass claimants were "improving slowly", yet defendants' allegedly (and blindly) adhered to the nonproductive treatment recipe all automobile accident claimants received.

86. In Massachusetts, chiropractors are licensed and monitored by the Massachusetts Board of Chiropractors.

87. Massachusetts chiropractors are further regulated pursuant to the Massachusetts Code of Regulations, promulgated by the Board of Chiropractors.

88. The defendants engaged in a systematic pattern and practice of unlawful acts in violation of the Board of Chiropractor Regulations codified at 233 CMR 4.00-4.15. The chart annexed hereto as Exhibit 1, and incorporated by reference herein as if set forth in its entirety, outlines defendants' claim-specific fraudulent conduct and details the specific nature of the misrepresentation(s) and/or other fraudulent content advanced by or on behalf of defendants with respect to each claim plead. Unless noted to the contrary, an indication that particular fraudulent conduct/content and/or representation was found in connection with a particular claimant is deemed to run through the totality of that patient's medical documentation (e.g., a finding that defendants violated Massachusetts law by "rendering a recipe of treatment absent any individualized medical decision making" — see Exhibit 1 — should be construed as alleging such wrongful conduct at the time of each record and invoice advanced in connection with the treatment allegedly rendered to the identified patients).

89. The pattern of medical billing fraud is exemplified by the recipe of treatment nearly every First Spine automobile accident patient received, regardless of, among other things, (1) mechanism of injury (2) age (3) location in vehicle (4) prior medical history (5) pre-existing condition (6) sex (7) physical composition (8) damage to vehicle (9) type of vehicle involved (10) safety restraints employed, is highlighted as follows:

RECIPE OF FIRST SPINE TREATMENT										
CLAIM	CLAIMANT	CLAIMANT	D.O.L.	D.O.I.E.	CPT	SMT TX IN	HEAT TX IN	EMS TX IN	RE- EXAM	RE- EXAM
NUMBER	FIRST NAME	LAST NAME			UPCODES	EXCESS OF 20	EXCESS OF 15	EXCESS OF 15	DATE	DELAY IN EXCESS OF 25 DAYS
03379614	Nikki	Kim	10/21/98	10/26/98	99205	45	22	22	11/23/98	27
03445702	Michael	Pho	05/28/01	05/29/01	99204	38	24	24	06/26/01	27

RECIPE OF FIRST SPINE TREATMENT										
CLAIM	CLAIMANT	CLAIMANT	D.O.L.	D.O.I.E.	CPT	SMT TX IN	HEAT TX IN	EMS TX IN	RE- EXAM	RE- EXAM
NUMBER	FIRST NAME	LAST NAME			UPCODES	EXCESS OF 20	EXCESS OF 15	EXCESS OF 15	DATE	DELAY IN EXCESS OF 25 DAYS
03467477	Volak	Neang	02/07/02	02/12/02	99204	21	20	21	03/13/02	28
03467477	Samnang	San	02/07/02	02/11/02	99205	40	22	22	03/12/02	28
03436611	Lan	Lim	02/19/00	02/22/00	99205	41	27	27	03/22/00	28
03447628	Samnang	Ngeth	06/25/00	06/28/00	99205	41	41	29	07/27/00	28
03418795	Punlork	Sar	02/11/01	02/12/01	99205	40	20	20	03/14/01	29
03442397	Thanh	Som	02/17/01	02/19/01	99205	45	21	21	03/21/01	29
03469203	Rick (Kimsat)	Ban	03/29/02	04/01/02	99204	46	21	21	05/01/02	29
03418795	Sambun	Sar	02/11/01	02/12/01	99205	42	23	24	03/14/01	29
03418795	Samban	Bo	02/11/01	02/12/01	99205	37	26	26	03/14/01	29
03479077	Kongkeo	Phomhipak	09/07/02	09/09/02	99204	31	18	18	10/10/02	30
03479077	Khammoune	Panya	09/07/02	09/09/02	99204	45	19	19	10/10/02	30
03470133	Bunkeath	Meng	04/19/02	04/22/02	99204	42	21	21	05/23/02	30
03456762	Pamela	Nou	09/06/01	09/10/01	99204	43	24	25	10/11/01	30
03456762	Saroeun	Hou	09/06/01	09/10/01	99205	42	26	26	10/11/01	30
03419107	Sareth	Heang	02/18/01	02/21/01	99204	22	17	16	03/26/01	32
03419107	Kim	Neang	02/18/01	02/21/01	99205	37	16	18	03/26/01	32
03417806	Hoeurn	Men	01/20/01	01/24/01	99205	38	19	19	02/26/01	32
03419107	Cang	Keo	02/18/01	02/21/01	99205	37	21	19	03/26/01	32
03419107	Khawaii	Sok	02/18/01	02/21/01	99205	45	25	23	03/26/01	32
03462436	Sar	Chhean	02/13/02	02/14/02	99205	41	27	27	03/19/02	32
03485151	Ron	Phay	09/16/02	09/17/02	99204	41	15	15	10/21/02	33
03485151	Susie	Soeun	09/16/02	09/17/02	99204	40	17	17	10/21/02	33
03465736	Phala	Phoun	06/04/02	06/07/02	99205	43	18	18	07/11/02	33
03468665	Sitha	Ngeth	03/15/02	03/19/02	99205	43	19	19	04/22/02	33
03468665	Sitha	Mam	03/15/02	03/19/02	99205	45	21	21	04/22/02	33
03465736	Chhang	Kang	06/04/02	06/07/02	99204	43	22	23	07/11/02	33
03448910	Muth	Seng	08/14/01	08/15/01	99204	40	23	23	09/18/01	33
03486642	Den	Tith	10/16/02	10/16/02	99204	40	24	24	11/19/02	33
03391026	Uyen	Le	07/26/00	07/27/00	99205	40	24	24	08/30/00	33
03411511	Sareth	Nuon	05/22/01	05/29/01	99204	44	24	25	07/02/01	33
03448910	Vandary	Seng	08/14/01	08/15/01	99204	38	25	25	09/18/01	33
03381790	Sokcheath	Prak	12/14/98	12/17/98	99205	46	26	25	01/20/99	33
03464524	Mom	Sok	04/23/02	04/30/02	99204	31	26	26	06/03/02	33
03448910	Sivinary	Seng	08/14/01	08/15/01	99204	40	26	26	09/18/01	33
03464524	Jerry	Seng	04/23/02	04/30/02	99204	29	26	27	06/03/02	33
03447628	Veasna	Ngeth	06/25/00	06/28/00	99205	38	37	29	08/01/00	33
03439611	Sokhan	Yang	05/19/00	05/23/00	99205	40	30	30	06/26/00	33
03473966	Diane	Melo	07/15/02	07/17/02	99204	30	30	31	08/20/02	33
03444156	Anirut	Khuanphat	03/06/01	03/07/01	99205	41	19	20	04/11/01	34
03457321	Sunnhak	Chiv	09/21/01	09/25/01	99205	42	21	20	10/30/01	34
03468665	Samnang	Ngeth	03/15/02	03/19/02	99205	45	21	21	04/23/02	34
03456832	Dalin	Ou	09/08/01	09/10/01	99204	41	22	22	10/15/01	34
03475016	Song	Taing	08/03/02	08/07/02	99204	42	22	22	09/11/02	34
03402742	Sacha	Tang	09/08/00	09/25/00	99205	40	25	25	10/30/00	34
03418795	Samantha	Mao	02/11/01	02/12/01	99205	28	25	26	03/19/01	34
03418795	Lysabad	Bo	02/11/01	02/12/01	99205	36	26	26	03/19/01	34
03418795	Sambath	Bo	02/11/01	02/12/01	99205	38	26	26	03/19/01	34

RECIPE OF FIRST SPINE TREATMENT										
CLAIM	CLAIMANT	CLAIMANT	D.O.L.	D.O.I.E.	CPT	SMT TX IN	HEAT TX IN	EMS TX IN	RE- EXAM	RE- EXAM
NUMBER	FIRST NAME	LAST NAME			UPCODES	EXCESS OF 20	EXCESS OF 15	EXCESS OF 15	DATE	DELAY IN EXCESS OF 25 DAYS
03462771	Cheatra	So	02/24/02	02/26/02	99204	46	27	26	04/02/02	34
03438972	Juan	Disla	01/14/00	01/17/00	99205	41	28	27	02/21/00	34
03467194	Paul	Taylor	01/30/02	02/06/02	99205	25	31	32	03/13/02	34
03468725	Sophay	Porth	03/18/02	03/19/02	99205	40	17	16	04/24/02	35
03485991	Ly	Chan	10/02/02	10/02/02	99204	37	17	19	11/07/02	35
03469203	At	Ban	03/29/02	04/01/02	99204	42	19	19	05/07/02	35
03413857	Dou	Narith	08/30/00	09/11/00	99205	43	30	30	10/17/00	35
03485991	Pheakdey	Sok	10/02/02	10/02/02	99204	41	15	15	11/08/02	36
03420810	Bin	Real	04/02/01	04/10/01	99205	39	21	17	05/17/01	36
03402742	Viphearea	Srey	09/08/00	09/25/00	99205	42	20	20	11/01/00	36
03438972	Angela	Mejia	01/14/00	01/17/00	99205	40	28	28	02/23/00	36
03445147	Sophea	Um	05/10/01	05/14/01	99205	41	17	18	06/21/01	37
03449560	Morn	Samith	10/05/02	10/07/02	99204	44	22	22	11/14/02	37
03402742	Wilson	Douangchack	09/08/00	09/25/00	99205	26	24	24	11/02/00	37
03470133	Rochenna	Sim	04/19/02	04/22/02	99204	43	21	21	05/31/02	38
03474153	Phyun	Chhim	07/18/02	07/18/02	99204	42	18	20	08/27/02	39
03465736	Chanda	Kong	06/04/02	06/07/02	99204	42	21	22	07/17/02	39
03425232	Narayuth	Mak	04/25/99	07/01/99	99205	37	25	26	08/10/99	39
03374831	Saroeun	Sim	07/18/98	07/22/98	99205	40	28	28	08/31/98	39
03408504	Kevin	Meas	02/23/01	02/28/01	99205	32	24	24	04/10/01	40
03448741	Katie	Duong	08/06/01	08/08/01	99205	29	22	25	09/18/01	40
03415449	Roth	Khim	11/25/00	12/11/00	99204	34	22	22	01/22/01	41
03341477	Phally	Lang	10/29/99	11/01/99	99205	47	26	26	12/13/99	41
03456832	Michael	Soum	09/08/01	09/10/01	99204	40	23	22	10/23/01	42
03408504	Samnang	Khut	02/23/01	02/28/01	99205	28	23	23	04/12/01	42
03467477	Sophinnary	Ung	02/07/02	03/12/02	99205	24	16	16	04/25/02	43
03439668	Veun	Long	05/22/00	05/22/00	99205	42	19	19	07/05/00	43
03468725	Phoeun	Sam	03/18/02	03/19/02	99205	40	23	21	05/02/02	43
03464524	Melody	Seng	04/23/02	04/20/02	99204	31	26	27	06/03/02	43
03415264	Bin	Suon	11/18/00	11/18/00	99205	24	21	21	01/02/01	44
03486571	Sovanna	Uy	09/18/02	09/23/02	99204	21	15	30	11/08/02	45
03420777	Sart	Sok	04/01/01	04/04/01	99205	38	21	21	05/21/01	46
03468725	Krapomroth	Khim	03/18/02	03/19/02	99205	41	18	17	05/06/02	47
03461410	Sarath	Ros	01/15/02	01/16/02	99204	34	21	20	03/05/02	47
03414287	Knamsing	Khammanivong	10/25/00	11/08/00	99205	40	22	22	12/26/00	47
03461410	Bunthy	Chantha	01/15/02	01/16/02	99205	24	23	24	03/05/02	47
03331518	Tut	Hok	09/11/98	09/16/98	99205	44	28	29	11/03/98	47
03445338	Phyun	Chhim	05/16/01	05/21/01	99205	45	23	23	07/09/01	48
03414287	Doeun	Uy	10/25/00	11/06/00	99205	43	23	22	12/26/00	49
03392271	Radet	Yem	08/29/00	08/31/00	99205	41	28	28	10/26/00	55
03415432	Sarath	Bou	11/25/00	11/27/00	99205	40	20	20	01/23/01	56
03415432	Sarunn	Vorn	11/25/00	11/29/00	99205	39	23	23	01/25/01	56
03415760	Savy	Moun	11/26/00	11/27/00	99205	37	19	19	01/25/01	58
03486647	Vich	Lam	10/16/02	10/17/02	99204	42	20	20	12/17/02	60
03374831	Sokea	Un	07/18/98	07/22/98	99205	38	17	17	09/24/98	63
03459630	It	Toun	11/26/01	11/28/01	99204	39	25	25	01/31/02	63
03445338	Ratha	So	05/16/01	05/22/01	99205	43	24	25	07/27/01	65

RECIPE OF FIRST SPINE TREATMENT										
CLAIM	CLAIMANT	CLAIMANT	D.O.L.	D.O.I.E.	CPT	SMT TX IN	HEAT TX IN	EMS TX IN	RE- EXAM	RE- EXAM
NUMBER	FIRST NAME	LAST NAME			UPCODES	EXCESS OF 20	EXCESS OF 15	EXCESS OF 15	DATE	DELAY IN EXCESS OF 25 DAYS
03486795	Savonn	Yonn	10/19/02	10/21/02	99204	40	22	22	01/02/03	72
03467477	Pholla	Long	02/07/02	02/11/02	99204	47	23	24	04/30/02	77
03420810	Nickie	Phan	04/02/01	04/10/01	99205	39	21	21	06/28/01	78
03415264	Ngeth	Soeung	11/18/00	11/18/00	99205	42	22	22	02/08/01	81
03415524	Sophoeun	Kong	11/26/00	11/29/00	99205	41	25	25	03/08/01	98
03415524	Eath	Keo	11/26/00	11/24/00	99205	41	26	27	03/09/01	104
03459630	Tuy	Pei	11/26/01	11/28/01	99204	42	29	29	03/14/02	105
03414660	Ouk	Ti	11/01/00	11/08/00	99205	39	21	21	02/26/01	109

90. All automobile accident patients received the same frequency of treatment—four (4) appointments per week for the first two (2) weeks, three (3) appointments per week thereafter—absent any individual medical decision-making or nexus between the patient “needs” and defendants’ fiscal goals.

91. In connection with each of the patients identified in Exhibit 1, the defendants created and submitted false medical documentation to Encompass (and others including First Spine patient attorneys who, in turn, sent the false medical documentation to Encompass) through the U.S. Mail demanding payment pursuant to Mass. Gen. Laws ch. 90, §34M and the Standard Massachusetts Automobile Policy.

92. All of the medical bills advanced by First Spine contained Current Procedural Terminology Codes (hereinafter “CPT Codes”).

93. CPT Codes are published annually by the American Medical Association (hereinafter “AMA”) to facilitate the efficient processing of medical charges by insurance carriers and other private and governmental health care payors.

94. By including CPT Codes on their bills, First Spine represented to Encompass that the modalities listed on the bill were performed in a manner required by the AMA's guidelines.

95. By creating medical bills that include CPT Codes, then causing such invoices to be mailed to Encompass, the defendants were representing that the invoiced treatment modalities had been performed in conformity with the AMA's CPT Code guidelines.

96. Many of the bills prepared and submitted by First Spine, under the defendants' supervision and control, were submitted under improper and/or deceptive CPT Codes.

97. First Spine engaged in CPT upcoding in connection with the alleged treatment of patients for which Encompass became responsible. See Exhibit 1. By way of example, First Spine virtually without deviation billed Encompass for a patient's initial office visit under CPT Code 99205 or 99204. The criteria developed by the AMA to properly assign a CPT Code to medical billing invoices include the components illustrated in the chart below.

	HISTORY	EXAMINATION	MEDICAL DECISION MAKING	FACE TO FACE TIME
99201	Problem focused	Problem focused	Straight forward	10 minutes
99202	Expanded problem focused	Expanded problem focused	Straight forward	20 minutes
99203	Detailed	Detailed	Low complexity	30 minutes
99204	Comprehensive	Comprehensive	Moderate complexity	45 minutes
99205	Comprehensive	Comprehensive	High complexity	60 minutes

The factors considered to determine the "complexity" of medical decision making in arriving at a proper CPT Code assignment include:

	NUMBER OF DIAGNOSES OR MANAGEMENT OPTIONS	AMOUNT AND/OR COMPLEXITY OF DATA TO BE REVIEWED	RISK OF COMPLICATIONS AND/OR MORBIDITY OR MORTALITY
Straight forward medical decision making (CPT Code 99201-99202)	Minimal	Minimal or none	Minimal
Low complexity medical decision making (CPT Code 99203)	Limited	Limited	Low
Moderate complexity medical decision making (CPT Code 99204)	Multiple	Moderate	Moderate
High complexity medical decision making (CPT Code 99205)	Extensive	Extensive	High

98. Accordingly, to warrant a medical bill demanding payment for CPT Code 99205, the injury/condition would necessarily require:

- a. a high risk of mortality, morbidity and/or complications;
- b. extensive diagnoses and review of complex data; and
- c. the defendants to: 1) obtain comprehensive patient histories; 2) conduct comprehensive examinations; and 3) evaluate a patient (face-to-face) interaction for approximately 60 minutes.

99. The defendants submitted false medical documentation and billing including unwarranted and false CPT designations in connection with the following First Spine files:

CPT UPCODING INITIAL EXAM				
CLAIM NUMBER	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DATE OF LOSS	CPT CODE
03415449	Roth	Khim	11/25/00	99204
03419107	Sareth	Heang	02/18/01	99204
03445147	Phamaro	Uong	05/10/01	99204
03445702	Michael	Pho	05/28/01	99204
03411511	Sareth	Nuon	05/22/01	99204
03448910	Sunnak	Chiv	08/14/01	99204
03448910	Vandary	Seng	08/14/01	99204
03448910	Muth	Seng	08/14/01	99204
03448910	Sivinary	Seng	08/14/01	99204
03456762	Pamela	Nou	09/06/01	99204
03456832	Dalin	Ou	09/08/01	99204
03456832	Michael	Soum	09/08/01	99204
03457313	Tim	Ouen	09/22/01	99204
03459630	It	Toun	11/26/01	99204
03461410	Sarath	Ros	01/15/02	99204
03467477	Pholla	Long	02/07/02	99204
03467477	Volak	Neang	02/07/02	99204
03462771	Cheatra	So	02/24/02	99204
03469203	Rick (Kimsat)	Ban	03/29/02	99204
03469203	At	Ban	03/29/02	99204
03469371	Savan	Vat	04/04/02	99204
03469510	Sokhan	Bum	04/07/02	99204
03464524	Melody	Seng	04/23/02	99204
03470133	Bunkeath	Meng	04/19/02	99204
03470133	Rochenna	Sim	04/19/02	99204
03464524	Jerry	Seng	04/23/02	99204
03464524	Mom	Sok	04/23/02	99204
03465736	Chanda	Kong	06/04/02	99204
03465736	Chhang	Kang	06/04/02	99204
03473966	Diane	Melo	07/15/02	99204
03474153	Phyun	Chhim	07/18/02	99204
03475016	Song	Taing	08/03/02	99204
03479077	Khammoune	Panya	09/07/02	99204
03479077	Kongkeo	Phomhipak	09/07/02	99204
03485151	Ron	Phay	09/16/02	99204
03485151	Susie	Soeun	09/16/02	99204
03486571	Sovanna	Uy	09/18/02	99204
03486571	Lath	Uy	09/18/02	99204
03485991	Ly	Chan	10/02/02	99204

CPT UPCODING INITIAL EXAM				
CLAIM NUMBER	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DATE OF LOSS	CPT CODE
03485991	Pheakdey	Sok	10/02/02	99204
03449560	Morn	Samith	10/05/02	99204
03486642	Den	Tith	10/16/02	99204
03486647	Vich	Lam	10/16/02	99204
03486795	Savonn	Yonn	10/19/02	99204
03420777	Khen	Khut	04/01/01	99204
03459630	Hun	Hum	11/26/01	99204
03459630	Jim	Bun	11/26/01	99204
03459630	Tuy	Pei	11/26/01	99204
03326411	Hang	Tran	01/09/98	99205
03326411	Nguyet	Nguyen	01/09/98	99205
03374831	Sokea	Un	07/18/98	99205
03374831	Saroeun	Sim	07/18/98	99205
03374831	Saroeut	Roum	07/18/98	99205
03374831	Sendy	Un	07/18/98	99205
03331518	Tut	Hok	09/11/98	99205
03379614	Nikki	Kim	10/21/98	99205
03381790	Sokcheath	Prak	12/14/98	99205
03381790	Sophalla	Chum	12/14/98	99205
03381790	Sophaly	Chum	12/14/98	99205
03421674	April	Thanongsinh	01/08/99	99205
03425856	Oeun	Tim	05/16/99	99205
03425856	Timmy	Tim	05/16/99	99205
03425232	Emmy	Vann	04/25/99	99205
03425232	Naravuth	Mak	04/25/99	99205
03425232	Narayuth	Mak	04/25/99	99205
03425232	Sandy	Mak	04/25/99	99205
03341477	Phally	Lang	10/29/99	99205
03432698	Peou	Ing	11/09/99	99205
03438972	Angela	Mejia	01/14/00	99205
03438972	Juan	Disla	01/14/00	99205
03436611	Lan	Lim	02/19/00	99205
03439611	Sokhan	Yang	05/19/00	99205
03440595	Sarin	Chhay	06/15/00	99205
03447628	Samnang	Ngeth	06/25/00	99205
03447628	Veasna	Ngeth	06/25/00	99205
03391026	Uyen	Le	07/26/00	99205
03392271	Radet	Yem	08/29/00	99205
03413857	Dou	Narith	08/30/00	99205
03402742	Sacha	Tang	09/08/00	99205

CPT UPCODING INITIAL EXAM				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>CPT CODE</u>
03402742	Viphearea	Srey	09/08/00	99205
03402742	Wilson	Douangchack	09/08/00	99205
03403606	Margarita	Pina	10/06/00	99205
03414287	Doeun	Uy	10/25/00	99205
03414660	Ouk	Ti	11/01/00	99205
03414287	Knamsing	Khammanivong	10/25/00	99205
03415264	Bin	Suon	11/18/00	99205
03415264	Ngeth	Soeung	11/18/00	99205
03415524	Eath	Keo	11/26/00	99205
03415760	Savy	Moun	11/26/00	99205
03415432	Sarath	Bou	11/25/00	99205
03415524	Sophoeun	Kong	11/26/00	99205
03415432	Sarunn	Vorn	11/25/00	99205
03417806	Nhem	Ngeth	01/20/01	99205
03417806	Hoeurn	Men	01/20/01	99205
03418795	Lysabad	Bo	02/11/01	99205
03418795	Punlork	Sar	02/11/01	99205
03418795	Samantha	Mao	02/11/01	99205
03418795	Samban	Bo	02/11/01	99205
03418795	Sambath	Bo	02/11/01	99205
03418795	Sambun	Sar	02/11/01	99205
03418926	Nikki	Kim	02/13/01	99205
03442397	Thanh	Som	02/17/01	99205
03419107	Cang	Keo	02/18/01	99205
03419107	Khawaii	Sok	02/18/01	99205
03419107	Kim	Neang	02/18/01	99205
03408504	Samnang	Khut	02/23/01	99205
03408504	Kevin	Meas	02/23/01	99205
03444156	Anirut	Khuanphat	03/06/01	99205
03420777	Sart	Sok	04/01/01	99205
03420810	Bin	Real	04/02/01	99205
03420810	Nickie	Phan	04/02/01	99205
03420777	Oeun	Men	04/01/01	99205
03445147	Sophea	Um	05/10/01	99205
03445338	Phyrun	Chhim	05/16/01	99205
03445338	Ratha	So	05/16/01	99205
03448741	Katie	Duong	08/06/01	99205
03456762	Saroeun	Hou	09/06/01	99205
03457321	Sunnhak	Chiv	09/21/01	99205
03461410	Bunthy	Chantha	01/15/02	99205

CPT UPCODING INITIAL EXAM				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>CPT CODE</u>
03467194	Paul	Taylor	01/30/02	99205
03467477	Samnang	San	02/07/02	99205
03462436	Ry	Chhaim	02/13/02	99205
03462436	Sar	Chhean	02/13/02	99205
03439668	Veun	Long	05/22/00	99205
03467477	Sophinnary	Ung	02/07/02	99205
03468665	Samnang	Ngeth	03/15/02	99205
03468665	Sitha	Mam	03/15/02	99205
03468665	Sitha	Ngeth	03/15/02	99205
03468725	Krapomroth	Khim	03/18/02	99205
03468725	Phoeun	Sam	03/18/02	99205
03468725	Sophay	Porth	03/18/02	99205
03469757	Khon	Lay	04/15/02	99205
03465736	Phala	Phoun	06/04/02	99205

CPT UPCODING RE-EXAM				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>R.E. CODE</u>
03438972	Angela	Mejia	01/14/00	99214
03415264	Ngeth	Soeung	11/18/00	99214
03420810	Nickie	Phan	04/02/01	99214
03467477	Pholla	Long	02/07/02	99214
03439668	Veun	Long	05/22/00	99214
03469757	Khon	Lay	04/15/02	99214
03464524	Jerry	Seng	04/23/02	99214
03464524	Mom	Sok	04/23/02	99214
03479077	Kongkeo	Phomhipak	09/07/02	99214
03485151	Ron	Phay	09/16/02	99214
03485151	Susie	Soeun	09/16/02	99214
03486571	Lath	Uy	09/18/02	99214
03485991	Ly	Chan	10/02/02	99214
03485991	Pheakdey	Sok	10/02/02	99214
03449560	Morn	Samith	10/05/02	99214
03486642	Den	Tith	10/16/02	99214
03486647	Vich	Lam	10/16/02	99214
03480962	Chea	Theng	11/18/02	99214
03481235	Sally	Kong	11/27/02	99214
03481654	Mao	Ngeth	12/13/02	99214
03481654	Nhoeun	Hem	12/13/02	99214

CPT UPCODING RE-EXAM				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>R.E. CODE</u>
03481722	Sarom	Him	12/12/02	99214
03482803	Thaverei	Veuk	01/21/03	99214
03482803	Sareth	Veuk	01/21/03	99214
03483246	Phath	Sim	02/07/03	99214
03483838	Sokean	Phlong	02/14/03	99214
03483838	Brandon	Ouer	02/14/03	99214
03504615	Kimsan	Mom	06/07/03	99214
03510448	Samnang	Sok	07/26/03	99214
03510448	Sophannara	Eang	07/26/03	99214
03508820	Katherine	Mam	08/12/03	99214
03508820	Linda	Nuth	08/12/03	99214
03508820	Kimsat	Nuth	08/12/03	99214
03513997	Chareth	Rath	10/27/03	99214
03513997	Kristina	Rath	10/27/03	99214
03513997	Saleen	Phan	10/27/03	99214
03530556	Ken	Truong	12/10/03	99214
03532767	Demetri	Molina	01/10/04	99214
03532767	Robert	Delavalle	01/10/04	99214
03532353	Pat	Song	01/03/04	99214
03533438	Michael	Inthabane	01/19/04	99214
03536789	Savy	Vong	03/16/04	99214
03540127	Sam	Sok	05/14/04	99214
03532767	Alma	Carrasquillo	01/10/04	99214
03504357	Sokhon	Sem	06/03/03	99214
03511086	Morn	Samith	09/18/03	99214
03415432	Sophal	Phan	11/25/00	99214
03487016	Rida	Chum	10/23/02	99214
03487193	Sakun	Sam	10/26/02	99214
03500338	Jimmy	Rom	03/24/03	99214
03500338	John	Rom	03/24/03	99214
03500338	Kong	Liv	03/24/03	99214
03500623	Channak	Phal	03/28/03	99214
03506013	Sokunthea	Eang	06/12/03	99214
03505976	Keo	Kothpratoum	06/28/03	99214
03505976	Vanta	Phanthanousinh	06/28/03	99214
03506712	John	Rom	07/11/03	99214
03506712	Liv	Kong	07/11/03	99214
03514331	Chhat	Phim	11/07/03	99214
03425856	Oeun	Tim	05/16/99	99215
03459630	Tuy	Pei	11/26/01	99215

CPT UPCODING RE-EXAM				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>R.E. CODE</u>
03381790	Sophalla	Chum	12/14/98	99214
03425232	Emmy	Vann	04/25/99	99214
03425232	Narayuth	Mak	04/25/99	99214
03341477	Phally	Lang	10/29/99	99214
03438972	Angela	Mejia	01/14/00	99214
03438972	Juan	Disla	01/14/00	99214
03439611	Sokhan	Yang	05/19/00	99214
03391026	Uyen	Le	07/26/00	99214
03392271	Radet	Yem	08/29/00	99214
03402742	Sacha	Tang	09/08/00	99214
03402742	Viphearea	Srey	09/08/00	99214
03414287	Doeun	Uy	10/25/00	99214
03414660	Ouk	Ti	11/01/00	99214
03414287	Knamsing	Khammanivong	10/25/00	99214
03415524	Eath	Keo	11/26/00	99214
03415760	Savy	Moun	11/26/00	99214
03415432	Sarunn	Vorn	11/25/00	99214
03415449	Roth	Khim	11/25/00	99214
03417806	Nhem	Ngeth	01/20/01	99214
03417806	Hoeurn	Men	01/20/01	99214
03442397	Thanh	Som	02/17/01	99214
03419107	Cang	Keo	02/18/01	99214
03419107	Khawaii	Sok	02/18/01	99214
03419107	Kim	Neang	02/18/01	99214
03444156	Anirut	Khuanphat	03/06/01	99214
03420777	Sart	Sok	04/01/01	99214
03420777	Oeun	Men	04/01/01	99214
03445147	Phamaro	Uong	05/10/01	99214
03445147	Sophea	Um	05/10/01	99214
03445338	Phyrun	Chhim	05/16/01	99214
03445338	Ratha	So	05/16/01	99214
03411511	Sareth	Nuon	05/22/01	99214
03448910	Vandary	Seng	08/14/01	99214
03456762	Pamela	Nou	09/06/01	99214
03456762	Saroeun	Hou	09/06/01	99214
03456832	Dalin	Ou	09/08/01	99214
03456832	Michael	Soum	09/08/01	99214
03457321	Sunnhak	Chiv	09/21/01	99214
03459630	It	Toun	11/26/01	99214
03467477	Samnang	San	02/07/02	99214

CPT UPCODING RE-EXAM				
CLAIM NUMBER	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DATE OF LOSS	R.E. CODE
03462436	Sar	Chhean	02/13/02	99214
03462771	Nheop	So	02/24/02	99214
03468665	Samnang	Ngeth	03/15/02	99214
03468665	Sitha	Mam	03/15/02	99214
03468665	Sitha	Ngeth	03/15/02	99214
03469203	Rick (Kimsat)	Ban	03/29/02	99214
03469203	At	Ban	03/29/02	99214
03470133	Bunkeath	Meng	04/19/02	99214
03470133	Rochenna	Sim	04/19/02	99214
03465736	Chanda	Kong	06/04/02	99214
03465736	Chhang	Kang	06/04/02	99214
03465736	Phala	Phoun	06/04/02	99214
03475016	Song	Taing	08/03/02	99214
03486571	Sovanna	Uy	09/18/02	99214
03487193	Sophaanee	Uy	10/26/02	99214
03510448	Sophannara	Eang	07/26/03	99214
03513997	Vongdeane	Khiaosoth	10/27/03	99214
03532767	Robert	Delavalle	01/10/04	99214
03381790	Sophaly	Chum	12/14/98	99215
03382948	Saroeun	Chhan	02/02/99	99215
03425856	Timmy	Tim	05/16/99	99215
03425232	Naravuth	Mak	04/25/99	99215
03425232	Sandy	Mak	04/25/99	99215
03436611	Lan	Lim	02/19/00	99215
03413857	Dou	Narith	08/30/00	99215
03415264	Ngeth	Soeung	11/18/00	99215
03418795	Lysabad	Bo	02/11/01	99215
03418795	Punlork	Sar	02/11/01	99215
03418795	Samantha	Mao	02/11/01	99215
03418795	Samban	Bo	02/11/01	99215
03418795	Sambath	Bo	02/11/01	99215
03418795	Sambun	Sar	02/11/01	99215
03418926	Nikki	Kim	02/13/01	99215
03408504	Kevin	Meas	02/23/01	99215
03420810	Bin	Real	04/02/01	99215
03420810	Nickie	Phan	04/02/01	99215
03448910	Muth	Seng	08/14/01	99215
03448910	Sivinary	Seng	08/14/01	99215
03461410	Sarath	Ros	01/15/02	99215
03462771	Paulika	So	02/24/02	99215

CPT UPCODING RE-EXAM				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>R.E. CODE</u>
03462771	Phaectra	So	02/24/02	99215
03462771	Savuth	Phan	02/24/02	99215
03468725	Krapomroth	Khim	03/18/02	99215
03468725	Phoeun	Sam	03/18/02	99215
03468725	Sophay	Porth	03/18/02	99215
03469757	Khon	Lay	04/15/02	99215
03464524	Melody	Seng	04/23/02	99215
03464524	Jerry	Seng	04/23/02	99215
03464524	Mom	Sok	04/23/02	99215
03504615	Vanneck	Chea	06/07/03	99215
03505976	Keo	Kothpratoum	06/28/03	99215
03505976	Vanta	Phanthanousinh	06/28/03	99215
03510448	Kim	Sambath	07/26/03	99215
03510448	Samnang	Sok	07/26/03	99215
03508820	Katherine	Mam	08/12/03	99215
03513997	Chareth	Rath	10/27/03	99215
03513997	Kristina	Rath	10/27/03	99215
03530556	Ken	Truong	12/10/03	99215
03532767	Demetri	Molina	01/10/04	99215
03532353	Pat	Song	01/03/04	99215
03504357	Sokhon	Sem	06/03/03	99215
03415432	Sophal	Phan	11/25/00	99215

100. The defendants operating through First Spine made material misrepresentations of fact and engaged in intentionally unfair and deceptive business practices by creating and mailing through the U.S. Mail, medical bills that included CPT Codes for treatment modalities that were not performed or were not performed consistent with the AMA's CPT requirements.

101. The medical invoices created by the defendants were generated at Future Management's headquarters in Chelmsford, Massachusetts and were not reviewed for accuracy by the alleged treating chiropractor.

102. The defendants altered medical documentation -- such alterations not being relevant to the medical well-being of First Spine patients, but rather to deceive insurers (including Encompass) to better guarantee payment of First Spine claims.

103. Such medical record alteration is carried out under the direction and control of defendants and other unknown Future Management bookkeeping personnel.

104. In some cases, Future Management employees under the direction and control of, one or more of the individual defendants, altered and/or created medical records, invoices and health-insurance claim forms with incorrect chiropractor identification (i.e., not the chiropractor who purportedly rendered treatment in a given case) in place of the actual "treating" chiropractors who were otherwise not privileged and/or licensed and/or approved to submit bills in certain instances.

105. The number of chiropractic modalities allegedly rendered by First Spine in connection with the treatment of each alleged patient guaranteed that a patient's medical bills would exceed the \$2,000 tort threshold codified at Mass. Gen. Laws ch. 231, §6D, as illustrated in the table below:

<u>MEDICAL BILLS EXCEED TORT THRESHOLD</u>				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>AMOUNT BILLED</u>
03448910	Sivinary	Seng	08/14/01	\$2,110.00
03425232	Sandy	Mak	04/25/99	\$2,135.00
03448910	Muth	Seng	08/14/01	\$2,145.00
03506013	Sokunthea	Eang	06/12/03	\$2,175.00
03486795	Savonn	Yonn	10/19/02	\$2,195.00
03425232	Naravuth	Mak	04/25/99	\$2,320.00
03469371	Savan	Vat	04/04/02	\$2,330.00
03486571	Lath	Uy	09/18/02	\$2,347.00
03480962	Chea	Theng	11/18/02	\$2,430.00
03486571	Sovanna	Uy	09/18/02	\$2,450.00
03465736	Chanda	Kong	06/04/02	\$2,475.00

MEDICAL BILLS EXCEED TORT THRESHOLD				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>AMOUNT BILLED</u>
03415264	Bin	Suon	11/18/00	\$2,505.00
03467477	Sophinnary	Ung	02/07/02	\$2,535.00
03500623	Channak	Phal	03/28/03	\$2,535.00
03506712	John	Rom	07/11/03	\$2,570.23
03510448	Sophannara	Eang	07/26/03	\$2,640.00
03402742	Wilson	Douangchack	09/08/00	\$2,780.00
03468725	Krapomroth	Khim	03/18/02	\$2,800.00
03500338	Jimmy	Rom	03/24/03	\$2,815.00
03530556	Ken	Truong	12/10/03	\$2,870.00
03420810	Bin	Real	04/02/01	\$2,925.00
03483838	Brandon	Ouer	02/14/03	\$2,935.00
03479077	Khammoune	Panya	09/07/02	\$2,980.00
03487193	Sophaanee	Uy	10/26/02	\$2,995.00
03500338	John	Rom	03/24/03	\$3,025.00
03533438	Michael	Inthabane	01/19/04	\$3,045.00
03379614	Nikki	Kim	10/21/98	\$3,095.00
03467194	Paul	Taylor	01/30/02	\$3,100.00
03420777	Oeun	Men	04/01/01	\$3,115.00
03500338	Kong	Liv	03/24/03	\$3,132.00
03403606	Margarita	Pina	10/06/00	\$3,160.00
03448741	Katie	Duong	08/06/01	\$3,180.00
03425232	Emmy	Vann	04/25/99	\$3,190.00
03432698	Peou	Ing	11/09/99	\$3,195.00
03462771	Cheatra	So	02/24/02	\$3,210.00
03418795	Samantha	Mao	02/11/01	\$3,230.00
03425232	Narayuth	Mak	04/25/99	\$3,240.00
03481654	Mao	Ngeth	12/13/02	\$3,270.00
03479077	Kongkeo	Phomhipak	09/07/02	\$3,285.00
03374831	Saroeut	Roum	07/18/98	\$3,315.00
03462771	Savuth	Phan	02/24/02	\$3,350.00
03442397	Thanh	Som	02/17/01	\$3,380.00
03415264	Ngeth	Soeung	11/18/00	\$3,385.00
03469757	Khon	Lay	04/15/02	\$3,395.00
03532767	Robert	Delavalle	01/10/04	\$3,420.00
03513997	Saleen	Phan	10/27/03	\$3,475.00
03415432	Sophal	Phan	11/25/00	\$3,485.00
03408504	Samnang	Khut	02/23/01	\$3,505.00
03408504	Kevin	Meas	02/23/01	\$3,505.00
03418926	Nikki	Kim	02/13/01	\$3,520.00
03415449	Roth	Khim	11/25/00	\$3,535.00

MEDICAL BILLS EXCEED TORT THRESHOLD				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>AMOUNT BILLED</u>
03487016	Diana	Phanthavong	10/23/02	\$3,545.00
03381790	Sophaly	Chum	12/14/98	\$3,555.00
03481654	Nhoeun	Hem	12/13/02	\$3,595.00
03464524	Jerry	Seng	04/23/02	\$3,625.00
03382948	Saroeun	Chhan	02/02/99	\$3,625.00
03468725	Sophay	Porth	03/18/02	\$3,665.00
03374831	Saroeun	Sim	07/18/98	\$3,675.00
03464524	Mom	Sok	04/23/02	\$3,705.00
03514331	Chhat	Phim	11/07/03	\$3,735.00
03464524	Melody	Seng	04/23/02	\$3,745.00
03419107	Cang	Keo	02/18/01	\$3,765.00
03419107	Kim	Neang	02/18/01	\$3,765.00
03506712	Liv	Kong	07/11/03	\$3,805.00
03381790	Sophalla	Chum	12/14/98	\$3,815.00
03415760	Savy	Moun	11/26/00	\$3,820.00
03467477	Volak	Neang	02/07/02	\$3,835.00
03504357	Keath	Toch	06/03/03	\$3,850.00
03445702	Michael	Pho	05/28/01	\$3,910.00
03485991	Ly	Chan	10/02/02	\$3,910.00
03414660	Ouk	Ti	11/01/00	\$3,930.00
03473966	Diane	Melo	07/15/02	\$3,937.90
03419107	Sareth	Heang	02/18/01	\$3,945.00
03438972	Angela	Mejia	01/14/00	\$3,950.00
03420777	Sart	Sok	04/01/01	\$3,960.00
03425856	Oeun	Tim	05/16/99	\$3,979.00
03417806	Hoeurn	Men	01/20/01	\$3,990.00
03485151	Ron	Phay	09/16/02	\$4,015.00
03487016	Rida	Chum	10/23/02	\$4,015.00
03391026	Uyen	Le	07/26/00	\$4,020.00
03331518	Tut	Hok	09/11/98	\$4,025.00
03504615	Kimsan	Mom	06/07/03	\$4,030.00
03438972	Juan	Disla	01/14/00	\$4,032.00
03415432	Sarath	Bou	11/25/00	\$4,035.00
03420810	Nickie	Phan	04/02/01	\$4,050.00
03420777	Khen	Khut	04/01/01	\$4,055.00
03448910	Vandary	Seng	08/14/01	\$4,070.00
03418795	Sambath	Bo	02/11/01	\$4,075.00
03444156	Anirut	Khuanphat	03/06/01	\$4,100.00
03402742	Viphearea	Srey	09/08/00	\$4,105.00
03418795	Punlork	Sar	02/11/01	\$4,125.00

MEDICAL BILLS EXCEED TORT THRESHOLD				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>AMOUNT BILLED</u>
03418795	Samban	Bo	02/11/01	\$4,125.00
03402742	Sacha	Tang	09/08/00	\$4,130.00
03447628	Veasna	Ngeth	06/25/00	\$4,130.00
03445147	Sophea	Um	05/10/01	\$4,145.00
03381790	Sokcheath	Prak	12/14/98	\$4,165.00
03445147	Phamaro	Uong	05/10/01	\$4,175.00
03341477	Phally	Lang	10/29/99	\$4,220.00
03468725	Phoeun	Sam	03/18/02	\$4,230.00
03418795	Lysabad	Bo	02/11/01	\$4,245.00
03374831	Sokea	Un	07/18/98	\$4,250.00
03439668	Veun	Long	05/22/00	\$4,260.00
03439611	Sokhan	Yang	05/19/00	\$4,265.00
03436611	Lan	Lim	02/19/00	\$4,270.00
03417806	Nhem	Ngeth	01/20/01	\$4,275.00
03462771	Paulika	So	02/24/02	\$4,280.00
03447628	Samnang	Ngeth	06/25/00	\$4,285.00
03415524	Sophoeun	Kong	11/26/00	\$4,290.00
03392271	Radet	Yem	08/29/00	\$4,295.00
03513997	Chareth	Rath	10/27/03	\$4,295.00
03415524	Eath	Keo	11/26/00	\$4,300.00
03532767	Alma	Carrasquillo	01/10/04	\$4,310.00
03504357	Channara	Dam	06/03/03	\$4,325.00
03418795	Sambun	Sar	02/11/01	\$4,345.00
03483246	Phath	Sim	02/07/03	\$4,345.00
03511086	Morn	Samith	09/18/03	\$4,365.00
03481722	Sarom	Him	12/12/02	\$4,415.00
03457321	Sunnhak	Chiv	09/21/01	\$4,430.00
03462436	Ry	Chhaim	02/13/02	\$4,460.00
03481235	Sally	Kong	11/27/02	\$4,465.00
03485151	Susie	Soeun	09/16/02	\$4,470.00
03540127	Sam	Sok	05/14/04	\$4,470.00
03504357	Sokkhoeun	Sem	06/03/03	\$4,515.00
03511086	Thea	Soun	09/18/03	\$4,520.00
03485991	Pheakdey	Sok	10/02/02	\$4,525.00
03456832	Dalin	Ou	09/08/01	\$4,535.00
03413857	Dou	Narith	08/30/00	\$4,580.00
03419107	Khawaii	Sok	02/18/01	\$4,580.00
03411511	Sareth	Nuon	05/22/01	\$4,585.00
03445338	Ratha	So	05/16/01	\$4,595.00
03504357	Chantha	Sem	06/03/03	\$4,595.00

MEDICAL BILLS EXCEED TORT THRESHOLD				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>AMOUNT BILLED</u>
03445338	Phyrun	Chhim	05/16/01	\$4,610.00
03483838	Sokean	Phlong	02/14/03	\$4,625.00
03456762	Saroeun	Hou	09/06/01	\$4,635.00
03532353	Pat	Song	01/03/04	\$4,635.00
03456832	Michael	Soum	09/08/01	\$4,660.00
03456762	Pamela	Nou	09/06/01	\$4,695.00
03490345	Rithy	Mao	12/26/02	\$4,705.00
03505976	Vanta	Phanthanousinh	06/28/03	\$4,705.00
03486647	Vich	Lam	10/16/02	\$4,715.00
03486642	Den	Tith	10/16/02	\$4,765.00
03532767	Demetri	Molina	01/10/04	\$4,765.00
03468665	Samnang	Ngeth	03/15/02	\$4,770.00
03474153	Phyrun	Chhim	07/18/02	\$4,802.90
03510448	Samnang	Sok	07/26/03	\$4,815.00
03465736	Phala	Phoun	06/04/02	\$4,855.00
03468665	Sitha	Ngeth	03/15/02	\$4,870.00
03469203	Rick (Kimsat)	Ban	03/29/02	\$4,890.00
03504357	Sokhon	Sem	06/03/03	\$4,890.00
03487193	Sakun	Sam	10/26/02	\$4,905.00
03468665	Sitha	Mam	03/15/02	\$4,915.00
03465736	Chhang	Kang	06/04/02	\$4,928.00
03449560	Morn	Samith	10/05/02	\$4,935.00
03482803	Sareth	Veuk	01/21/03	\$4,965.00
03505976	Keo	Kothpratoum	06/28/03	\$4,985.00
03470133	Bunkeath	Meng	04/19/02	\$4,990.00
03461410	Sarath	Ros	01/15/02	\$4,995.00
03459630	It	Toun	11/26/01	\$5,000.00
03504357	Sokha	Sem	06/03/03	\$5,020.00
03508820	Katherine	Mam	08/12/03	\$5,055.00
03470133	Rochenna	Sim	04/19/02	\$5,095.00
03536789	Savy	Vong	03/16/04	\$5,120.00
03461410	Bunthy	Chantha	01/15/02	\$5,160.00
03467477	Samnang	San	02/07/02	\$5,185.00
03459630	Jim	Bun	11/26/01	\$5,195.00
03462436	Sar	Chhean	02/13/02	\$5,200.00
03504615	Vanneck	Chea	06/07/03	\$5,245.00
03459630	Tuy	Pei	11/26/01	\$5,250.00
03459630	Hun	Hum	11/26/01	\$5,260.00
03508820	Linda	Nuth	08/12/03	\$5,280.00
03469203	At	Ban	03/29/02	\$5,385.00

MEDICAL BILLS EXCEED TORT THRESHOLD				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>AMOUNT BILLED</u>
03510448	Kim	Sambath	07/26/03	\$5,525.00
03475016	Song	Taing	08/03/02	\$5,544.00
03462771	Phaectra	So	02/24/02	\$5,560.00
03467477	Pholla	Long	02/07/02	\$5,645.00
03482803	Thaverei	Veuk	01/21/03	\$5,795.00

106. First Spine and their runner agents would assist First Spine clinic patients to obtain legal representation to pursue personal injury lawsuits.

107. At all relevant times, First Spine chiropractors were required to market First Spine services to personal injury attorneys.

108. First Spine routinely delayed the submission of records and bills to insurers, including Encompass. (See Exhibit 1). This tactic thwarted Encompass' opportunity to perform a timely, objective and independent evaluation of (1) the patient's true condition, (2) the necessity of the treatment allegedly rendered, and (3) the reasonableness of the fees charged.

109. The defendants exaggerated misrepresented and fabricated reports to claimant attorneys to increase settlement potential. (See Exhibit 1).

110. By advancing their bills in this manner, defendants intended that Encompass would rely upon the accuracy of such invoices when evaluating them for payment.

111. By creating false documentation, First Spine engaged in an ongoing pattern of unfair and deceptive business practices within the meaning of Mass. Gen. Laws ch. 93A.

112. In addition to the specific indicia of fraud alleged above and highlighted in Exhibits 1-3, incorporated herein by reference, the medical documentation created and submitted by defendants in connection with the patients identified in the following table are false and excessive for over utilization of charges for spinal manipulation treatment unwarranted in light of the documented type, nature and extent of injury and/or symptoms:

UNWARRANTED SPINAL MANIPULATION				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>NO. OF SPINAL MANIPULATIONS</u>
03532767	Alma	Carrasquillo	01/10/04	20
03467477	Volak	Neang	02/07/02	21
03486571	Sovanna	Uy	09/18/02	21
03481722	Sarom	Him	12/12/02	21
03419107	Sareth	Heang	02/18/01	22
03486571	Lath	Uy	09/18/02	22
03483838	Brandon	Ouer	02/14/03	22
03530556	Ken	Truong	12/10/03	22
03511086	Thea	Soun	09/18/03	22
03415432	Sophal	Phan	11/25/00	22
03500338	John	Rom	03/24/03	23
03415264	Bin	Suon	11/18/00	24
03420777	Oeun	Men	04/01/01	24
03461410	Bunthy	Chantha	01/15/02	24
03467477	Sophinnary	Ung	02/07/02	24
03467194	Paul	Taylor	01/30/02	25
03500338	Jimmy	Rom	03/24/03	25
03425232	Sandy	Mak	04/25/99	26
03402742	Wilson	Douangchack	09/08/00	26
03506712	Liv	Kong	07/11/03	26
03403606	Margarita	Pina	10/06/00	27
03487193	Sophannee	Uy	10/26/02	27
03418795	Samantha	Mao	02/11/01	28
03408504	Samnang	Khut	02/23/01	28
03510448	Sophannara	Eang	07/26/03	28
03448741	Katie	Duong	08/06/01	29
03462771	Savuth	Phan	02/24/02	29
03464524	Jerry	Seng	04/23/02	29

UNWARRANTED SPINAL MANIPULATION				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>NO. OF SPINAL MANIPULATIONS</u>
03425856	Timmy	Tim	05/16/99	30
03440595	Sarin	Chhay	06/15/00	30
03473966	Diane	Melo	07/15/02	30
03500623	Channak	Phal	03/28/03	30
03532767	Robert	Delavalle	01/10/04	30
03469757	Khon	Lay	04/15/02	31
03464524	Melody	Seng	04/23/02	31
03464524	Mom	Sok	04/23/02	31
03479077	Kongkeo	Phomhipak	09/07/02	31
03508820	Katherine	Mam	08/12/03	31
03432698	Peou	Ing	11/09/99	32
03408504	Kevin	Meas	02/23/01	32
03513997	Saleen	Phan	10/27/03	33
03415449	Roth	Khim	11/25/00	34
03461410	Sarath	Ros	01/15/02	34
03493502	Diane	Melo	12/08/03	34
03514331	Chhat	Phim	11/07/03	35
03425232	Naravuth	Mak	04/25/99	36
03418795	Lysabad	Bo	02/11/01	36
03462436	Ry	Chhaim	02/13/02	36
03382948	Saroeun	Chhan	02/02/99	37
03425232	Narayuth	Mak	04/25/99	37
03415760	Savy	Moun	11/26/00	37
03418795	Samban	Bo	02/11/01	37
03419107	Cang	Keo	02/18/01	37
03419107	Kim	Neang	02/18/01	37
03485991	Ly	Chan	10/02/02	37
03374831	Sokea	Un	07/18/98	38
03425232	Emmy	Vann	04/25/99	38
03447628	Veasna	Ngeth	06/25/00	38
03417806	Hoeurn	Men	01/20/01	38
03418795	Sambath	Bo	02/11/01	38
03420777	Sart	Sok	04/01/01	38
03445702	Michael	Pho	05/28/01	38
03448910	Vandary	Seng	08/14/01	38
03483246	Phath	Sim	02/07/03	38
03500338	Kong	Liv	03/24/03	38
03374831	Saroeut	Roum	07/18/98	39
03414660	Ouk	Ti	11/01/00	39
03415432	Sarunn	Vorn	11/25/00	39

UNWARRANTED SPINAL MANIPULATION				
CLAIM NUMBER	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	NO. OF SPINAL MANIPULATIONS
03420810	Bin	Real	04/02/01	39
03420810	Nickie	Phan	04/02/01	39
03459630	It	Toun	11/26/01	39
03481654	Nhoeun	Hem	12/13/02	39
03506712	John	Rom	07/11/03	39
03374831	Saroeun	Sim	07/18/98	40
03438972	Angela	Mejia	01/14/00	40
03439611	Sokhan	Yang	05/19/00	40
03391026	Uyen	Le	07/26/00	40
03402742	Sacha	Tang	09/08/00	40
03414287	Knamsing	Khammanivong	10/25/00	40
03415432	Sarath	Bou	11/25/00	40
03418795	Punlork	Sar	02/11/01	40
03445147	Phamaro	Uong	05/10/01	40
03448910	Muth	Seng	08/14/01	40
03448910	Sivinary	Seng	08/14/01	40
03456832	Michael	Soum	09/08/01	40
03467477	Samnang	San	02/07/02	40
03468725	Phoeun	Sam	03/18/02	40
03468725	Sophay	Porth	03/18/02	40
03485151	Susie	Soeun	09/16/02	40
03486642	Den	Tith	10/16/02	40
03486795	Savonn	Yonn	10/19/02	40
03481654	Mao	Ngeth	12/13/02	40
03483838	Sokean	Phlong	02/14/03	40
03532353	Pat	Song	01/03/04	40
03540127	Sam	Sok	05/14/04	40
03420777	Khen	Khut	04/01/01	40
03438972	Juan	Disla	01/14/00	41
03436611	Lan	Lim	02/19/00	41
03447628	Samnang	Ngeth	06/25/00	41
03392271	Radet	Yem	08/29/00	41
03415524	Eath	Keo	11/26/00	41
03415524	Sophoeun	Kong	11/26/00	41
03418926	Nikki	Kim	02/13/01	41
03444156	Anirut	Khuanphat	03/06/01	41
03445147	Sophea	Um	05/10/01	41
03456832	Dalin	Ou	09/08/01	41
03462436	Sar	Chhean	02/13/02	41
03462771	Nheop	So	02/24/02	41

UNWARRANTED SPINAL MANIPULATION				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>NO. OF SPINAL MANIPULATIONS</u>
03468725	Krapomroth	Khim	03/18/02	41
03485151	Ron	Phay	09/16/02	41
03485991	Pheakdey	Sok	10/02/02	41
03505976	Vanta	Phanthanousinh	06/28/03	41
03533438	Michael	Inthabane	01/19/04	41
03425856	Oeun	Tim	05/16/99	42
03402742	Viphearea	Srey	09/08/00	42
03415264	Ngeth	Soeung	11/18/00	42
03418795	Sambun	Sar	02/11/01	42
03456762	Saroeun	Hou	09/06/01	42
03457321	Sunnhak	Chiv	09/21/01	42
03439668	Veun	Long	05/22/00	42
03469203	At	Ban	03/29/02	42
03470133	Bunkeath	Meng	04/19/02	42
03465736	Chanda	Kong	06/04/02	42
03474153	Phyrun	Chhim	07/18/02	42
03475016	Song	Taing	08/03/02	42
03486647	Vich	Lam	10/16/02	42
03487016	Diana	Phanthavong	10/23/02	42
03487016	Rida	Chum	10/23/02	42
03490345	Rithy	Mao	12/26/02	42
03505976	Keo	Kothpratoum	06/28/03	42
03510448	Samnang	Sok	07/26/03	42
03532767	Demetri	Molina	01/10/04	42
03536789	Savy	Vong	03/16/04	42
03459630	Hun	Hum	11/26/01	42
03459630	Tuy	Pei	11/26/01	42
03413857	Dou	Narith	08/30/00	43
03414287	Doeun	Uy	10/25/00	43
03445338	Ratha	So	05/16/01	43
03456762	Pamela	Nou	09/06/01	43
03462771	Paulika	So	02/24/02	43
03468665	Sitha	Ngeth	03/15/02	43
03470133	Rochenna	Sim	04/19/02	43
03465736	Chhang	Kang	06/04/02	43
03465736	Phala	Phoun	06/04/02	43
03480962	Chea	Theng	11/18/02	43
03481235	Sally	Kong	11/27/02	43
03504615	Kimsan	Mom	06/07/03	43
03508820	Linda	Nuth	08/12/03	43

UNWARRANTED SPINAL MANIPULATION				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DOL</u>	<u>NO. OF SPINAL MANIPULATIONS</u>
03508820	Kimsat	Nuth	08/12/03	43
03513997	Vongdeaone	Khiaosoth	10/27/03	43
03331518	Tut	Hok	09/11/98	44
03411511	Sareth	Nuon	05/22/01	44
03462771	Phaectra	So	02/24/02	44
03449560	Morn	Samith	10/05/02	44
03513997	Chareth	Rath	10/27/03	44
03504357	Sokhon	Sem	06/03/03	44
03511086	Morn	Samith	09/18/03	44
03379614	Nikki	Kim	10/21/98	45
03442397	Thanh	Som	02/17/01	45
03419107	Khawaii	Sok	02/18/01	45
03445338	Phyrun	Chhim	05/16/01	45
03468665	Samnang	Ngeth	03/15/02	45
03468665	Sitha	Mam	03/15/02	45
03479077	Khammoune	Panya	09/07/02	45
03513997	Kristina	Rath	10/27/03	45
03381790	Sokcheath	Prak	12/14/98	46
03462771	Cheatra	So	02/24/02	46
03469203	Rick (Kimsat)	Ban	03/29/02	46
03381790	Sophalla	Chum	12/14/98	47
03341477	Phally	Lang	10/29/99	47
03467477	Pholla	Long	02/07/02	47
03504615	Vanneck	Chea	06/07/03	47
03381790	Sophaly	Chum	12/14/98	48
03482803	Thaverei	Veuk	01/21/03	48
03482803	Sareth	Veuk	01/21/03	49
03510448	Kim	Sambath	07/26/03	49
03487193	Sakun	Sam	10/26/02	52

113. In addition to the specific indicia of fraud alleged above and highlighted in Exhibits 1-3, incorporated herein by reference, the medical documentation created and submitted by defendants in connection with the patients identified in the following table are false and excessive for over utilization of charges for chiropractic visits unwarranted in light of the documented type, nature and extent of injury and/or symptoms:

UNWARRANTED AND EXCESSIVE FIRST SPINE PATIENT VISITS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>TOTAL VISITS</u>
03483838	Brandon	Ouer	02/14/03	25
03500338	John	Rom	03/24/03	25
03530556	Ken	Truong	12/10/03	25
03467477	Volak	Neang	02/07/02	26
03403606	Margarita	Pina	10/06/00	27
03500338	Jimmy	Rom	03/24/03	27
03415432	Sopha	Phan	11/25/00	27
03461410	Bunthy	Chantha	01/15/02	28
03506712	Liv	Kong	07/11/03	28
03467477	Sophinnary	Ung	02/07/02	29
03402742	Wilson	Douangchack	09/08/00	29
03425232	Sandy	Mak	04/25/99	29
03462771	Nheop	So	02/24/02	30
03487193	Sophaanee	Uy	10/26/02	30
03440595	Sarin	Chhay	06/15/00	31
03408504	Samnang	Khut	02/23/01	31
03448741	Katie	Duong	08/06/01	31
03469757	Khon	Lay	04/15/02	31
03506712	John	Rom	07/11/03	31
03425856	Timmy	Tim	05/16/99	32
03467194	Paul	Taylor	01/30/02	32
03464524	Jerry	Seng	04/23/02	32
03532767	Robert	Delavalle	01/10/04	32
03418795	Samantha	Mao	02/11/01	33
03462771	Savuth	Phan	02/24/02	33
03464524	Melody	Seng	04/23/02	33
03479077	Kongkeo	Phomphipak	09/07/02	33
03500623	Channak	Phal	03/28/03	33
03432698	Peou	Ing	11/09/99	34
03464524	Mom	Sok	04/23/02	34
03473966	Diane	Melo	07/15/02	34
03508820	Katherine	Mam	08/12/03	34
03487016	Rida	Chum	10/23/02	35
03510448	Sophannara	Eang	07/26/03	35
03493502	Diane	Melo	12/08/03	35
03468725	Krapomroth	Khim	03/18/02	36
03468725	Sophay	Porth	03/18/02	36
03513997	Saleen	Phan	10/27/03	36
03425232	Emmy	Vann	04/25/99	36

UNWARRANTED AND EXCESSIVE FIRST SPINE PATIENT VISITS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>TOTAL VISITS</u>
03408504	Kevin	Meas	02/23/01	37
03402742	Sacha	Tang	09/08/00	37
03514331	Chhat	Phim	11/07/03	38
03425232	Naravuth	Mak	04/25/99	38
03402742	Viphearea	Srey	09/08/00	38
03415449	Roth	Khim	11/25/00	39
03485991	Ly	Chan	10/02/02	39
03425232	Narayuth	Mak	04/25/99	39
03439611	Sokhan	Yang	05/19/00	41
03447628	Veasna	Ngeth	06/25/00	41
03415760	Savy	Moun	11/26/00	41
03419107	Cang	Keo	02/18/01	41
03445702	Michael	Pho	05/28/01	41
03448910	Vandary	Seng	08/14/01	41
03448910	Muth	Seng	08/14/01	41
03462436	Ry	Chhaim	02/13/02	41
03481654	Nhoeun	Hem	12/13/02	41
03500338	Kong	Liv	03/24/03	41
03392271	Radet	Yem	08/29/00	42
03419107	Sareth	Heang	02/18/01	42
03419107	Kim	Neang	02/18/01	42
03420810	Bin	Real	04/02/01	42
03469203	At	Ban	03/29/02	42
03483246	Phath	Sim	02/07/03	42
03374831	Sokea	Un	07/18/98	43
03374831	Saroeun	Sim	07/18/98	43
03425856	Oeun	Tim	05/16/99	43
03438972	Angela	Mejia	01/14/00	43
03438972	Juan	Disla	01/14/00	43
03447628	Samnang	Ngeth	06/25/00	43
03391026	Uyen	Le	07/26/00	43
03414660	Ouk	Ti	11/01/00	43
03415432	Sarath	Bou	11/25/00	43
03415432	Sarunn	Vorn	11/25/00	43
03417806	Hoeurn	Men	01/20/01	43
03418795	Samban	Bo	02/11/01	43
03418795	Sambath	Bo	02/11/01	43
03420810	Nickie	Phan	04/02/01	43
03457321	Sunnhak	Chiv	09/21/01	43
03486642	Den	Tith	10/16/02	43

UNWARRANTED AND EXCESSIVE FIRST SPINE PATIENT VISITS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>TOTAL VISITS</u>
03487193	Sakun	Sam	10/26/02	43
03382948	Saroeun	Chhan	02/02/99	44
03436611	Lan	Lim	02/19/00	44
03414287	Doeun	Uy	10/25/00	44
03414287	Knamsing	Khammanivong	10/25/00	44
03415264	Ngeth	Soeung	11/18/00	44
03415524	Eath	Keo	11/26/00	44
03418926	Nikki	Kim	02/13/01	44
03444156	Anirut	Khuanphat	03/06/01	44
03485991	Pheakdey	Sok	10/02/02	44
03486795	Savonn	Yonn	10/19/02	44
03481654	Mao	Ngeth	12/13/02	44
03532353	Pat	Song	01/03/04	44
03540127	Sam	Sok	05/14/04	44
03415264	Bin	Suon	11/18/00	45
03418795	Lysabad	Bo	02/11/01	45
03418795	Sambun	Sar	02/11/01	45
03445147	Sopheha	Um	05/10/01	45
03448910	Sivinary	Seng	08/14/01	45
03456832	Dalin	Ou	09/08/01	45
03439668	Veun	Long	05/22/00	45
03462771	Paulika	So	02/24/02	45
03485151	Ron	Phay	09/16/02	45
03420777	Khen	Khut	04/01/01	45
03374831	Saroeut	Roum	07/18/98	46
03331518	Tut	Hok	09/11/98	46
03413857	Dou	Narith	08/30/00	46
03415524	Sophoeun	Kong	11/26/00	46
03417806	Nhem	Ngeth	01/20/01	46
03456832	Michael	Soum	09/08/01	46
03459630	It	Toun	11/26/01	46
03462436	Sar	Chhean	02/13/02	46
03470133	Bunkeath	Meng	04/19/02	46
03465736	Chanda	Kong	06/04/02	46
03475016	Song	Taing	08/03/02	46
03479077	Khammoune	Panya	09/07/02	46
03485151	Susie	Soeun	09/16/02	46
03487016	Diana	Phanthavong	10/23/02	46
03480962	Chea	Theng	11/18/02	46
03490345	Rithy	Mao	12/26/02	46

UNWARRANTED AND EXCESSIVE FIRST SPINE PATIENT VISITS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>TOTAL VISITS</u>
03483838	Sokean	Phlong	02/14/03	46
03505976	Keo	Kothpratoum	06/28/03	46
03513997	Vongdeane	Khiaosoth	10/27/03	46
03533438	Michael	Inthabane	01/19/04	46
03536789	Savy	Vong	03/16/04	46
03459630	Hun	Hum	11/26/01	46
03459630	Tuy	Pei	11/26/01	46
03470133	Rochenna	Sim	04/19/02	46
03418795	Punlork	Sar	02/11/01	47
03445147	Phamaro	Uong	05/10/01	47
03456762	Pamela	Nou	09/06/01	47
03456762	Saroeun	Hou	09/06/01	47
03467477	Samnang	San	02/07/02	47
03465736	Chhang	Kang	06/04/02	47
03465736	Phala	Phoun	06/04/02	47
03486647	Vich	Lam	10/16/02	47
03481235	Sally	Kong	11/27/02	47
03505976	Vanta	Phanthanousinh	06/28/03	47
03510448	Samnang	Sok	07/26/03	47
03508820	Linda	Nuth	08/12/03	47
03508820	Kimsat	Nuth	08/12/03	47
03513997	Chareth	Rath	10/27/03	47
03532767	Demetri	Molina	01/10/04	47
03504357	Sokhon	Sem	06/03/03	47
03379614	Nikki	Kim	10/21/98	48
03381790	Sophalla	Chum	12/14/98	48
03445338	Ratha	So	05/16/01	48
03461410	Sarath	Ros	01/15/02	48
03462771	Phaetra	So	02/24/02	48
03468665	Sitha	Mam	03/15/02	48
03468725	Phoeun	Sam	03/18/02	48
03469203	Rick (Kimsat)	Ban	03/29/02	48
03474153	Phyun	Chhim	07/18/02	48
03449560	Morn	Samith	10/05/02	48
03513997	Kristina	Rath	10/27/03	48
03511086	Morn	Samith	09/18/03	48
03511086	Thea	Soun	09/18/03	48
03341477	Phally	Lang	10/29/99	49
03442397	Thanh	Som	02/17/01	49
03419107	Khawaii	Sok	02/18/01	49

UNWARRANTED AND EXCESSIVE FIRST SPINE PATIENT VISITS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>TOTAL VISITS</u>
03445338	Phyrun	Chhim	05/16/01	49
03411511	Sareth	Nuon	05/22/01	49
03468665	Samnang	Ngeth	03/15/02	49
03462771	Cheatra	So	02/24/02	50
03504615	Vanneck	Chea	06/07/03	50
03381790	Sokcheath	Prak	12/14/98	51
03381790	Sophaly	Chum	12/14/98	51
03504615	Kimsan	Mom	06/07/03	51
03510448	Kim	Sambath	07/26/03	51
03482803	Thaverei	Veuk	01/21/03	52
03467477	Pholla	Long	02/07/02	53
03482803	Sareth	Veuk	01/21/03	53
03468665	Sitha	Ngeth	03/15/02	61

114. In addition to the specific indicia of fraud alleged above and highlighted in Exhibits 1-3, incorporated herein by reference, the medical documentation created and submitted by defendants in connection with the patients identified in the following table are false and excessive for over utilization of charges for heat treatments, unwarranted in light of the documented type, nature and extent of injury and/or symptoms:

UNWARRANTED AND EXCESSIVE HEAT TREATMENTS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>HEAT (97010)</u>
03485151	Ron	Phay	09/16/02	15
03486571	Sovanna	Uy	09/18/02	15
03485991	Pheakdey	Sok	10/02/02	15
03500338	John	Rom	03/24/03	15
03504357	Channara	Dam	06/03/03	15
03419107	Kim	Neang	02/18/01	16
03467477	Sophinnary	Ung	02/07/02	16
03481654	Mao	Ngeth	12/13/02	16
03481722	Sarom	Him	12/12/02	16
03500623	Channak	Phal	03/28/03	16
03506013	Sokunthea	Eang	06/12/03	16

UNWARRANTED AND EXCESSIVE HEAT TREATMENTS				
CLAIM NUMBER	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DATE OF LOSS	HEAT (97010)
03513997	Chareth	Rath	10/27/03	16
03540127	Sam	Sok	05/14/04	16
03374831	Sokea	Un	07/18/98	17
03419107	Sareth	Heang	02/18/01	17
03445147	Sophea	Um	05/10/01	17
03448910	Sunnak	Chiv	08/14/01	17
03468725	Sophay	Porth	03/18/02	17
03469371	Savan	Vat	04/04/02	17
03485151	Susie	Soeun	09/16/02	17
03485991	Ly	Chan	10/02/02	17
03481235	Sally	Kong	11/27/02	17
03483246	Phath	Sim	02/07/03	17
03500338	Jimmy	Rom	03/24/03	17
03445147	Phamaro	Uong	05/10/01	18
03468725	Krapomroth	Khim	03/18/02	18
03465736	Phala	Phoun	06/04/02	18
03474153	Phyrun	Chhim	07/18/02	18
03479077	Kongkeo	Phomhipak	09/07/02	18
03487016	Rida	Chum	10/23/02	18
03513997	Saleen	Phan	10/27/03	18
03514331	Chhat	Phim	11/07/03	18
03530556	Ken	Truong	12/10/03	18
03532767	Demetri	Molina	01/10/04	18
03511086	Morn	Samith	09/18/03	18
03415760	Savy	Moun	11/26/00	19
03417806	Hoeurn	Men	01/20/01	19
03444156	Anirut	Khuanphat	03/06/01	19
03439668	Veun	Long	05/22/00	19
03468665	Sitha	Ngeth	03/15/02	19
03469203	At	Ban	03/29/02	19
03479077	Khammoune	Panya	09/07/02	19
03480962	Chea	Theng	11/18/02	19
03490345	Rithy	Mao	12/26/02	19
03506712	John	Rom	07/11/03	19
03532767	Robert	Delavalle	01/10/04	19
03402742	Viphearea	Srey	09/08/00	20
03415432	Sarath	Bou	11/25/00	20
03417806	Nhem	Ngeth	01/20/01	20
03418795	Punlork	Sar	02/11/01	20
03467477	Volak	Neang	02/07/02	20

UNWARRANTED AND EXCESSIVE HEAT TREATMENTS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>HEAT (97010)</u>
03486647	Vich	Lam	10/16/02	20
03487016	Diana	Phanthavong	10/23/02	20
03510448	Sophannara	Eang	07/26/03	20
03513997	Vongdeane	Khiaosoth	10/27/03	20
03532353	Pat	Song	01/03/04	20
03420777	Khen	Khut	04/01/01	20
03414660	Ouk	Ti	11/01/00	21
03415264	Bin	Suon	11/18/00	21
03442397	Thanh	Som	02/17/01	21
03419107	Cang	Keo	02/18/01	21
03420777	Sart	Sok	04/01/01	21
03420810	Bin	Real	04/02/01	21
03420810	Nickie	Phan	04/02/01	21
03457321	Sunnhak	Chiv	09/21/01	21
03461410	Sarath	Ros	01/15/02	21
03462771	Paulika	So	02/24/02	21
03468665	Samnang	Ngeth	03/15/02	21
03468665	Sitha	Mam	03/15/02	21
03469203	Rick (Kimsat)	Ban	03/29/02	21
03470133	Bunkeath	Meng	04/19/02	21
03470133	Rochenna	Sim	04/19/02	21
03465736	Chanda	Kong	06/04/02	21
03487193	Sophaanee	Uy	10/26/02	21
03483838	Brandon	Ouer	02/14/03	21
03513997	Kristina	Rath	10/27/03	21
03379614	Nikki	Kim	10/21/98	22
03414287	Knamsing	Khammanivong	10/25/00	22
03415264	Ngeth	Soeung	11/18/00	22
03415449	Roth	Khim	11/25/00	22
03448741	Katie	Duong	08/06/01	22
03456832	Dalin	Ou	09/08/01	22
03467477	Samnang	San	02/07/02	22
03465736	Chhang	Kang	06/04/02	22
03475016	Song	Taing	08/03/02	22
03449560	Morn	Samith	10/05/02	22
03486795	Savonn	Yonn	10/19/02	22
03481654	Nhoeun	Hem	12/13/02	22
03487193	Sakun	Sam	10/26/02	22
03483838	Sokean	Phlong	02/14/03	22
03505976	Vanta	Phanthanousinh	06/28/03	22

UNWARRANTED AND EXCESSIVE HEAT TREATMENTS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>HEAT (97010)</u>
03510448	Samnang	Sok	07/26/03	22
03414287	Doeun	Uy	10/25/00	23
03415432	Sarunn	Vorn	11/25/00	23
03418795	Sambun	Sar	02/11/01	23
03408504	Samnang	Khut	02/23/01	23
03445338	Phyrun	Chhim	05/16/01	23
03448910	Muth	Seng	08/14/01	23
03456832	Michael	Soum	09/08/01	23
03461410	Bunthy	Chantha	01/15/02	23
03467477	Pholla	Long	02/07/02	23
03462771	Savuth	Phan	02/24/02	23
03468725	Phoeun	Sam	03/18/02	23
03391026	Uyen	Le	07/26/00	24
03402742	Wilson	Douangchack	09/08/00	24
03408504	Kevin	Meas	02/23/01	24
03445338	Ratha	So	05/16/01	24
03445702	Michael	Pho	05/28/01	24
03411511	Sareth	Nuon	05/22/01	24
03456762	Pamela	Nou	09/06/01	24
03486642	Den	Tith	10/16/02	24
03504357	Sokhon	Sem	06/03/03	24
03425232	Narayuth	Mak	04/25/99	25
03402742	Sacha	Tang	09/08/00	25
03415524	Sophoeun	Kong	11/26/00	25
03418795	Samantha	Mao	02/11/01	25
03419107	Khawaii	Sok	02/18/01	25
03448910	Vandary	Seng	08/14/01	25
03459630	It	Toun	11/26/01	25
03462771	Nheop	So	02/24/02	25
03482803	Sareth	Veuk	01/21/03	25
03381790	Sokcheath	Prak	12/14/98	26
03341477	Phally	Lang	10/29/99	26
03415524	Eath	Keo	11/26/00	26
03418795	Lysabad	Bo	02/11/01	26
03418795	Samban	Bo	02/11/01	26
03418795	Sambath	Bo	02/11/01	26
03448910	Sivinary	Seng	08/14/01	26
03456762	Saroeun	Hou	09/06/01	26
03464524	Melody	Seng	04/23/02	26
03464524	Jerry	Seng	04/23/02	26

UNWARRANTED AND EXCESSIVE HEAT TREATMENTS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>HEAT (97010)</u>
03464524	Mom	Sok	04/23/02	26
03533438	Michael	Inthabane	01/19/04	26
03436611	Lan	Lim	02/19/00	27
03462436	Sar	Chhean	02/13/02	27
03462771	Cheatra	So	02/24/02	27
03504615	Vanneck	Chea	06/07/03	27
03510448	Kim	Sambath	07/26/03	27
03374831	Saroeun	Sim	07/18/98	28
03331518	Tut	Hok	09/11/98	28
03438972	Angela	Mejia	01/14/00	28
03438972	Juan	Disla	01/14/00	28
03392271	Radet	Yem	08/29/00	28
03462771	Phaectra	So	02/24/02	28
03508820	Katherine	Mam	08/12/03	28
03508820	Kimsat	Nuth	08/12/03	28
03536789	Savy	Vong	03/16/04	28
03382948	Saroeun	Chhan	02/02/99	29
03440595	Sarin	Chhay	06/15/00	29
03459630	Hun	Hum	11/26/01	29
03459630	Tuy	Pei	11/26/01	29
03439611	Sokhan	Yang	05/19/00	30
03413857	Dou	Narith	08/30/00	30
03473966	Diane	Melo	07/15/02	30
03504615	Kimsan	Mom	06/07/03	30
03508820	Linda	Nuth	08/12/03	30
03467194	Paul	Taylor	01/30/02	31
03482803	Thaverei	Veuk	01/21/03	31
03493502	Diane	Melo	12/08/03	31
03505976	Keo	Kothpratoum	06/28/03	33
03447628	Veasna	Ngeth	06/25/00	37
03447628	Samnang	Ngeth	06/25/00	41

115. In addition to the specific indicia of fraud alleged above and highlighted in Exhibits 1-3, incorporated herein by reference, the medical documentation created and submitted by defendants in connection with the patients identified in the following table are false and excessive for over utilization of charges for electric muscle stimulation

treatments unwarranted in light of the documented type, nature and extent of injury
and/or symptoms:

UNWARRANTED AND EXCESSIVE EMS TREATMENTS CHART				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>EMS (97014)</u>
03485151	Ron	Phay	09/16/02	15
03485991	Pheakdey	Sok	10/02/02	15
03500338	John	Rom	03/24/03	15
03504357	Channara	Dam	06/03/03	15
03419107	Sareth	Heang	02/18/01	16
03420777	Oeun	Men	04/01/01	16
03467477	Sophinnary	Ung	02/07/02	16
03468725	Sophay	Porth	03/18/02	16
03469371	Savan	Vat	04/04/02	16
03481654	Mao	Ngeth	12/13/02	16
03481722	Sarom	Him	12/12/02	16
03500623	Channak	Phal	03/28/03	16
03506013	Sokunthea	Eang	06/12/03	16
03513997	Chareth	Rath	10/27/03	16
03540127	Sam	Sok	05/14/04	16
03374831	Sokea	Un	07/18/98	17
03420810	Bin	Real	04/02/01	17
03448910	Sunnak	Chiv	08/14/01	17
03468725	Krapomroth	Khim	03/18/02	17
03485151	Susie	Soeun	09/16/02	17
03481235	Sally	Kong	11/27/02	17
03483246	Phath	Sim	02/07/03	17
03500338	Jimmy	Rom	03/24/03	17
03419107	Kim	Neang	02/18/01	18
03445147	Sopheha	Um	05/10/01	18
03465736	Phala	Phoun	06/04/02	18
03479077	Kongkeo	Phomhipak	09/07/02	18
03487016	Rida	Chum	10/23/02	18
03513997	Saleen	Phan	10/27/03	18
03514331	Chhat	Phim	11/07/03	18
03511086	Morn	Samith	09/18/03	18
03415760	Savy	Moun	11/26/00	19
03417806	Nhem	Ngeth	01/20/01	19
03417806	Hoeurn	Men	01/20/01	19
03419107	Cang	Keo	02/18/01	19
03439668	Veun	Long	05/22/00	19
03468665	Sitha	Ngeth	03/15/02	19

UNWARRANTED AND EXCESSIVE EMS TREATMENTS CHART				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>EMS (97014)</u>
03469203	At	Ban	03/29/02	19
03479077	Khammoune	Panya	09/07/02	19
03485991	Ly	Chan	10/02/02	19
03480962	Chea	Theng	11/18/02	19
03490345	Rithy	Mao	12/26/02	19
03506712	John	Rom	07/11/03	19
03402742	Viphearea	Srey	09/08/00	20
03415432	Sarath	Bou	11/25/00	20
03418795	Punlork	Sar	02/11/01	20
03444156	Anirut	Khuanphat	03/06/01	20
03457321	Sunnhak	Chiv	09/21/01	20
03461410	Sarath	Ros	01/15/02	20
03474153	Phyrun	Chhim	07/18/02	20
03486647	Vich	Lam	10/16/02	20
03487016	Diana	Phanthavong	10/23/02	20
03513997	Kristina	Rath	10/27/03	20
03513997	Vongdeane	Khiaosoth	10/27/03	20
03530556	Ken	Truong	12/10/03	20
03532767	Robert	Delavalle	01/10/04	20
03532353	Pat	Song	01/03/04	20
03420777	Khen	Khut	04/01/01	20
03414660	Ouk	Ti	11/01/00	21
03415264	Bin	Suon	11/18/00	21
03442397	Thanh	Som	02/17/01	21
03420777	Sart	Sok	04/01/01	21
03420810	Nickie	Phan	04/02/01	21
03467477	Volak	Neang	02/07/02	21
03468665	Samnang	Ngeth	03/15/02	21
03468665	Sitha	Mam	03/15/02	21
03468725	Phoeun	Sam	03/18/02	21
03469203	Rick (Kimsat)	Ban	03/29/02	21
03470133	Bunkeath	Meng	04/19/02	21
03470133	Rochenna	Sim	04/19/02	21
03487193	Sophanee	Uy	10/26/02	21
03483838	Brandon	Ouer	02/14/03	21
03510448	Sophannara	Eang	07/26/03	21
03379614	Nikki	Kim	10/21/98	22
03414287	Doeun	Uy	10/25/00	22
03414287	Knamsing	Khammanivong	10/25/00	22
03415264	Ngeth	Soeung	11/18/00	22
03415449	Roth	Khim	11/25/00	22

UNWARRANTED AND EXCESSIVE EMS TREATMENTS CHART				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>EMS (97014)</u>
03456832	Dalin	Ou	09/08/01	22
03456832	Michael	Soum	09/08/01	22
03467477	Samnang	San	02/07/02	22
03462436	Ry	Chhaim	02/13/02	22
03465736	Chanda	Kong	06/04/02	22
03475016	Song	Taing	08/03/02	22
03449560	Morn	Samith	10/05/02	22
03486795	Savonn	Yonn	10/19/02	22
03481654	Nhoeun	Hem	12/13/02	22
03487193	Sakun	Sam	10/26/02	22
03505976	Vanta	Phanthanousinh	06/28/03	22
03415432	Sarunn	Vorn	11/25/00	23
03419107	Khawaii	Sok	02/18/01	23
03408504	Samnang	Khut	02/23/01	23
03445338	Phyrun	Chhim	05/16/01	23
03448910	Muth	Seng	08/14/01	23
03462771	Nheop	So	02/24/02	23
03462771	Savuth	Phan	02/24/02	23
03465736	Chhang	Kang	06/04/02	23
03483838	Sokean	Phlong	02/14/03	23
03391026	Uyen	Le	07/26/00	24
03402742	Wilson	Douangchack	09/08/00	24
03418795	Sambun	Sar	02/11/01	24
03408504	Kevin	Meas	02/23/01	24
03445702	Michael	Pho	05/28/01	24
03461410	Bunthy	Chantha	01/15/02	24
03467477	Pholla	Long	02/07/02	24
03486642	Den	Tith	10/16/02	24
03510448	Samnang	Sok	07/26/03	24
03381790	Sokcheath	Prak	12/14/98	25
03402742	Sacha	Tang	09/08/00	25
03415524	Sophoeun	Kong	11/26/00	25
03445338	Ratha	So	05/16/01	25
03411511	Sareth	Nuon	05/22/01	25
03448741	Katie	Duong	08/06/01	25
03448910	Vandary	Seng	08/14/01	25
03456762	Pamela	Nou	09/06/01	25
03459630	It	Toun	11/26/01	25
03482803	Sareth	Veuk	01/21/03	25
03504357	Sokhon	Sem	06/03/03	25
03425232	Narayuth	Mak	04/25/99	26

UNWARRANTED AND EXCESSIVE EMS TREATMENTS CHART				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>EMS (97014)</u>
03341477	Phally	Lang	10/29/99	26
03418795	Lysabad	Bo	02/11/01	26
03418795	Samantha	Mao	02/11/01	26
03418795	Samban	Bo	02/11/01	26
03418795	Sambath	Bo	02/11/01	26
03448910	Sivinary	Seng	08/14/01	26
03456762	Saroeun	Hou	09/06/01	26
03462771	Cheatra	So	02/24/02	26
03462771	Phaectra	So	02/24/02	26
03464524	Mom	Sok	04/23/02	26
03533438	Michael	Inthabane	01/19/04	26
03438972	Juan	Disla	01/14/00	27
03436611	Lan	Lim	02/19/00	27
03415524	Eath	Keo	11/26/00	27
03462436	Sar	Chhean	02/13/02	27
03464524	Melody	Seng	04/23/02	27
03464524	Jerry	Seng	04/23/02	27
03374831	Saroeun	Sim	07/18/98	28
03438972	Angela	Mejia	01/14/00	28
03392271	Radet	Yem	08/29/00	28
03462771	Paulika	So	02/24/02	28
03504615	Vanneck	Chea	06/07/03	28
03510448	Kim	Sambath	07/26/03	28
03508820	Katherine	Mam	08/12/03	28
03508820	Kimsat	Nuth	08/12/03	28
03536789	Savy	Vong	03/16/04	28
03331518	Tut	Hok	09/11/98	29
03382948	Saroeun	Chhan	02/02/99	29
03447628	Samnang	Ngeth	06/25/00	29
03447628	Veasna	Ngeth	06/25/00	29
03459630	Hun	Hum	11/26/01	29
03459630	Tuy	Pei	11/26/01	29
03439611	Sokhan	Yang	05/19/00	30
03440595	Sarin	Chhay	06/15/00	30
03413857	Dou	Narith	08/30/00	30
03486571	Sovanna	Uy	09/18/02	30
03508820	Linda	Nuth	08/12/03	30
03473966	Diane	Melo	07/15/02	31
03482803	Thaverei	Veuk	01/21/03	31
03504615	Kimsan	Mom	06/07/03	31
03493502	Diane	Melo	12/08/03	31

UNWARRANTED AND EXCESSIVE EMS TREATMENTS CHART				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>EMS (97014)</u>
03467194	Paul	Taylor	01/30/02	32
03532767	Demetri	Molina	01/10/04	32
03505976	Keo	Kothpratoum	06/28/03	33

116. In addition to the specific indicia of fraud alleged above and highlighted in Exhibits 1-3, incorporated herein by reference, the medical documentation created and submitted by defendants in connection with the patients identified in the following table are false and excessive for over utilization of charges for mechanical traction treatments unwarranted in light of the documented type, nature and extent of injury and/or symptoms:

UNWARRANTED AND EXCESSIVE TRACTION TREATMENTS				
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>TRACTION (97012)</u>
03485991	Ly	Chan	10/02/02	15
03374831	Sokea	Un	07/18/98	16
03481654	Nhoeun	Hem	12/13/02	16
03487193	Sakun	Sam	10/26/02	17
03425856	Timmy	Tim	05/16/99	18
03403606	Margarita	Pina	10/06/00	19
03420810	Bin	Real	04/02/01	19
03425232	Emmy	Vann	04/25/99	20
03425856	Oeun	Tim	05/16/99	22
03511086	Thea	Soun	09/18/03	22
03381790	Sophalla	Chum	12/14/98	23
03425232	Naravuth	Mak	04/25/99	23
03425232	Sandy	Mak	04/25/99	23
03432698	Peou	Ing	11/09/99	25
03506712	Liv	Kong	07/11/03	26
03418926	Nikki	Kim	02/13/01	36
03374831	Saroeut	Roum	07/18/98	37
03500338	Kong	Liv	03/24/03	37
03381790	Sophaly	Chum	12/14/98	46

117. In addition to the specific indicia of fraud alleged above and highlighted in Exhibits 1-3, incorporated herein by reference, the medical documentation created and submitted by defendants in connection with the patients identified in the following table are false and excessive for over utilization of charges for re-examinations allegedly performed, constitutes CPT upcoding, and wholly unwarranted alleged treatment, supporting the conclusion that the medical documentation created by defendants in connection with the identified patients is false and fraudulent:

FRAUDULENT RE-EXAMS								
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>INITIAL EXAM</u>	<u>RE-EXAM #1</u>	<u>RE-EXAM #2</u>	<u>DAYS BETWEEN D.O.I.E. & D.O.R.E. #1</u>	<u>DAYS BETWEEN D.O.R.E. #1 & D.O.R.E. #2</u>
03374831	Sokea	Un	07/18/98	07/22/98	09/24/98	11/02/98	63	38
03374831	Saroeun	Sim	07/18/98	07/22/98	08/31/98	N/A	39	N/A
03374831	Saroeut	Roum	07/18/98	07/22/98	09/01/98	10/23/98	40	51
03374831	Sendy	Un	07/18/98	07/22/98	09/15/98	09/30/98	54	14
03331518	Tut	Hok	09/11/98	09/16/98	11/03/98	12/16/98	47	42
03379614	Nikki	Kim	10/21/98	10/26/98	11/23/98	12/29/98	27	35
03381790	Sokcheath	Prak	12/14/98	12/17/98	01/20/99	02/11/99	33	21
03381790	Sophalla	Chum	12/14/98	12/17/98	01/25/99	03/15/99	38	48
03381790	Sophaly	Chum	12/14/98	12/17/98	01/25/99	05/17/99	38	111
03382948	Saroeun	Chhan	02/02/99	02/04/99	03/08/99	06/23/99	31	106
03425856	Oeun	Tim	05/16/99	05/17/99	08/11/99	09/20/99	85	39
03425856	Timmy	Tim	05/16/99	05/17/99	06/24/99	08/10/99	37	46
03425232	Emmy	Vann	04/25/99	07/01/99	08/19/99	10/06/99	48	47
03425232	Naravuth	Mak	04/25/99	07/01/99	08/10/99	09/27/99	39	47
03425232	Narayuth	Mak	04/25/99	07/01/99	08/10/99	09/27/99	39	47
03425232	Sandy	Mak	04/25/99	07/01/99	08/10/99	09/08/99	39	28
03341477	Phally	Lang	10/29/99	11/01/99	12/13/99	02/01/00	41	49
03432698	Peou	Ing	11/09/99	11/11/99	12/14/99	N/A	32	N/A
03438972	Angela	Mejia	01/14/00	01/17/00	02/23/00	04/10/00	36	46
03438972	Juan	Disla	01/14/00	01/17/00	02/21/00	04/05/00	34	43
03436611	Lan	Lim	02/19/00	02/22/00	03/22/00	05/31/00	28	69
03439611	Sokhan	Yang	05/19/00	05/23/00	06/26/00	08/14/00	33	48
03447628	Samnang	Ngeth	06/25/00	06/28/00	07/27/00	09/05/00	28	39
03447628	Veasna	Ngeth	06/25/00	06/28/00	08/01/00	09/21/00	33	50
03391026	Uyen	Le	07/26/00	07/27/00	08/30/00	10/18/00	33	48
03392271	Radet	Yem	08/29/00	08/31/00	10/26/00	02/12/01	55	108
03413857	Dou	Narith	08/30/00	09/11/00	10/17/00	01/15/01	35	89
03402742	Sacha	Tang	09/08/00	09/25/00	10/30/00	02/14/01	34	106

FRAUDULENT RE-EXAMS								
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>INITIAL EXAM</u>	<u>RE-EXAM #1</u>	<u>RE-EXAM #2</u>	<u>DAYS BETWEEN D.O.I.E. & D.O.R.E. #1</u>	<u>DAYS BETWEEN D.O.R.E. #1 & D.O.R.E. #2</u>
03402742	Viphearea	Srey	09/08/00	09/25/00	11/01/00	12/06/00	36	34
03402742	Wilson	Douangchack	09/08/00	09/25/00	11/02/00	N/A	37	N/A
03403606	Margarita	Pina	10/06/00	10/10/00	11/20/00	02/16/01	40	87
03414287	Doeun	Uy	10/25/00	11/06/00	12/26/00	02/26/01	49	61
03414660	Ouk	Ti	11/01/00	11/08/00	02/26/00	03/03/01	109	370
03414287	Knamsing	Khammanivon	10/25/00	11/08/00	12/26/00	03/15/01	47	78
03415264	Bin	Suon	11/18/00	11/18/00	01/02/01	N/A	44	N/A
03415264	Ngeth	Soeung	11/18/00	11/18/00	02/08/01	03/19/01	81	38
03415524	Eath	Keo	11/26/00	11/24/00	03/09/01	05/17/01	104	68
03415760	Savy	Moun	11/26/00	11/27/00	01/25/01	03/19/01	58	52
03415432	Sarath	Bou	11/25/00	11/27/00	01/23/01	03/22/01	56	57
03415432	Sophal	Phan	11/25/00	11/27/00	04/02/01	06/07/01	125	65
03415524	Sophoeun	Kong	11/26/00	11/29/00	03/08/01	04/17/01	98	39
03415432	Sarunn	Vorn	11/25/00	11/29/00	01/25/01	03/26/01	56	59
03415449	Roth	Khim	11/25/00	12/11/00	01/22/01	04/23/01	41	90
03417806	Nhem	Ngeth	01/20/01	01/24/01	02/26/01	04/09/01	32	41
03417806	Hoeurn	Men	01/20/01	01/24/01	02/26/01	04/09/01	32	41
03418795	Lysabad	Bo	02/11/01	02/12/01	03/19/01	06/07/01	34	79
03418795	Punlork	Sar	02/11/01	02/12/01	03/14/01	06/18/01	29	95
03418795	Samantha	Mao	02/11/01	02/12/01	03/19/01	04/23/01	34	34
03418795	Samban	Bo	02/11/01	02/12/01	03/14/01	05/29/01	29	75
03418795	Sambath	Bo	02/11/01	02/12/01	03/19/01	06/12/01	34	84
03418795	Sambun	Sar	02/11/01	02/12/01	03/14/01	06/04/01	29	81
03418926	Nikki	Kim	02/13/01	02/13/01	03/30/01	05/31/01	44	61
03442397	Thanh	Som	02/17/01	02/19/01	03/21/01	05/08/01	29	47
03419107	Sareth	Heang	02/18/01	02/21/01	03/26/01	N/A	32	N/A
03419107	Cang	Keo	02/18/01	02/21/01	03/26/01	05/10/01	32	44
03419107	Khawaii	Sok	02/18/01	02/21/01	03/26/01	05/22/01	32	56
03419107	Kim	Neang	02/18/01	02/21/01	03/26/01	05/09/01	32	43
03408504	Samnang	Khut	02/23/01	02/28/01	04/12/01	N/A	42	N/A
03408504	Kevin	Meas	02/23/01	02/28/01	04/10/01	07/10/01	40	90
03444156	Anirut	Khuanphat	03/06/01	03/07/01	04/11/01	05/31/01	34	49
03420777	Sart	Sok	04/01/01	04/04/01	05/21/01	06/28/01	46	37
03420810	Bin	Real	04/02/01	04/10/01	05/17/01	08/01/01	36	75
03420810	Nickie	Phan	04/02/01	04/10/01	06/28/01	07/30/01	78	31
03420777	Oeun	Men	04/01/01	04/12/01	05/07/01	05/22/01	24	14
03445147	Phamaro	Uong	05/10/01	05/14/01	06/14/01	07/25/01	30	40
03445147	Sopheha	Um	05/10/01	05/14/01	06/21/01	08/15/01	37	54
03445338	Phyrun	Chhim	05/16/01	05/21/01	07/09/01	08/20/01	48	41
03445338	Ratha	So	05/16/01	05/22/01	07/27/01	10/01/01	65	65
03445702	Michael	Pho	05/28/01	05/29/01	06/26/01	08/06/01	27	40
03411511	Sareth	Nuon	05/22/01	05/29/01	07/02/01	08/08/01	33	36
03448741	Katie	Duong	08/06/01	08/08/01	09/18/01	11/26/01	40	68
03448910	Vandary	Seng	08/14/01	08/15/01	09/18/01	10/29/01	33	40
03448910	Muth	Seng	08/14/01	08/15/01	09/18/01	12/03/01	33	75
03448910	Sivinary	Seng	08/14/01	08/15/01	09/18/01	12/03/01	33	75

FRAUDULENT RE-EXAMS								
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>INITIAL EXAM</u>	<u>RE-EXAM #1</u>	<u>RE-EXAM #2</u>	<u>DAYS BETWEEN D.O.I.E. & D.O.R.E. #1</u>	<u>DAYS BETWEEN D.O.R.E. #1 & D.O.R.E. #2</u>
03456762	Pamela	Nou	09/06/01	09/10/01	10/11/01	11/20/01	30	39
03456762	Saroeun	Hou	09/06/01	09/10/01	10/11/01	12/11/01	30	60
03456832	Dalin	Ou	09/08/01	09/10/01	10/15/01	11/27/01	34	42
03456832	Michael	Soum	09/08/01	09/10/01	10/23/01	12/12/01	42	49
03457321	Sunnhak	Chiv	09/21/01	09/25/01	10/30/01	12/19/01	34	49
03459630	It	Toun	11/26/01	11/28/01	01/31/02	02/20/02	63	19
03459630	Tuy	Pei	11/26/01	11/28/01	03/14/02	N/A	105	N/A
03461410	Bunthy	Chantha	01/15/02	01/16/02	03/05/02	N/A	47	N/A
03461410	Sarath	Ros	01/15/02	01/16/02	03/05/02	06/10/02	47	96
03467194	Paul	Taylor	01/30/02	02/06/02	03/13/02	N/A	34	N/A
03467477	Pholla	Long	02/07/02	02/11/02	04/30/02	07/15/02	77	75
03467477	Samnang	San	02/07/02	02/11/02	03/12/02	04/29/02	28	47
03467477	Volak	Neang	02/07/02	02/12/02	03/13/02	N/A	28	N/A
03462436	Ry	Chhaim	02/13/02	02/14/02	03/20/02	N/A	33	N/A
03462436	Sar	Chhean	02/13/02	02/14/02	03/19/02	04/30/02	32	41
03439668	Veun	Long	05/22/00	05/22/00	07/05/00	08/22/00	43	47
03462771	Cheatra	So	02/24/02	02/26/02	04/02/02	N/A	34	N/A
03462771	Nheop	So	02/24/02	02/26/02	04/02/02	05/15/02	34	42
03462771	Paulika	So	02/24/02	02/26/02	04/01/02	06/25/02	33	84
03462771	Phaectra	So	02/24/02	02/26/02	04/01/02	07/02/02	33	91
03462771	Savuth	Phan	02/24/02	02/27/02	04/02/02	06/06/02	33	64
03467477	Sophinnary	Ung	02/07/02	03/12/02	04/25/02	N/A	43	N/A
03468665	Samnang	Ngeth	03/15/02	03/19/02	04/23/02	06/11/02	34	48
03468665	Sitha	Mam	03/15/02	03/19/02	04/22/02	06/03/02	33	41
03468665	Sitha	Ngeth	03/15/02	03/19/02	04/22/02	06/03/02	33	41
03468725	Krapomroth	Khim	03/18/02	03/19/02	05/06/02	08/22/02	47	107
03468725	Phoeun	Sam	03/18/02	03/19/02	05/02/02	08/13/02	43	102
03468725	Sophay	Porth	03/18/02	03/19/02	04/24/02	07/22/02	35	88
03469203	Rick (Kimsat)	Ban	03/29/02	04/01/02	05/01/02	06/12/02	29	41
03469203	At	Ban	03/29/02	04/01/02	05/07/02	06/28/02	35	51
03469371	Savan	Vat	04/04/02	04/08/02	06/26/02	N/A	78	N/A
03469757	Khon	Lay	04/15/02	04/18/02	07/10/02	08/05/02	82	25
03464524	Melody	Seng	04/23/02	04/20/02	06/03/02	07/22/02	43	48
03470133	Bunkeath	Meng	04/19/02	04/22/02	05/23/02	07/03/02	30	40
03470133	Rochenna	Sim	04/19/02	04/22/02	05/31/02	07/03/02	38	32
03464524	Jerry	Seng	04/23/02	04/30/02	06/03/02	07/11/02	33	37
03464524	Mom	Sok	04/23/02	04/30/02	06/03/02	07/24/02	33	50
03465736	Chanda	Kong	06/04/02	06/07/02	07/17/02	08/27/02	39	40
03465736	Chhang	Kang	06/04/02	06/07/02	07/11/02	08/20/02	33	39
03465736	Phala	Phoun	06/04/02	06/07/02	07/11/02	08/20/02	33	39
03473966	Diane	Melo	07/15/02	07/17/02	08/20/02	N/A	33	N/A
03474153	Phyun	Chhim	07/18/02	07/18/02	08/27/02	N/A	39	N/A
03475016	Song	Taing	08/03/02	08/07/02	09/11/02	10/23/02	34	41
03479077	Khammoune	Panya	09/07/02	09/09/02	10/10/02	N/A	30	N/A
03479077	Kongkeo	Phomhipak	09/07/02	09/09/02	10/10/02	N/A	30	N/A

FRAUDULENT RE-EXAMS								
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>INITIAL EXAM</u>	<u>RE-EXAM #1</u>	<u>RE-EXAM #2</u>	<u>DAYS BETWEEN D.O.I.E. & D.O.R.E. #1</u>	<u>DAYS BETWEEN D.O.R.E. #1 & D.O.R.E. #2</u>
03485151	Ron	Phay	09/16/02	09/17/02	10/21/02	12/02/02	33	41
03485151	Susie	Soeun	09/16/02	09/17/02	10/21/02	01/06/03	33	76
03486571	Sovanna	Uy	09/18/02	09/23/02	11/08/02	11/21/02	45	12
03486571	Lath	Uy	09/18/02	09/24/02	11/25/02	N/A	61	N/A
03485991	Ly	Chan	10/02/02	10/02/02	11/07/02	01/07/03	35	60
03485991	Pheakdey	Sok	10/02/02	10/02/02	11/08/02	01/07/03	36	59
03449560	Morn	Samith	10/05/02	10/07/02	11/14/02	01/07/03	37	53
03486642	Den	Tith	10/16/02	10/16/02	11/19/02	01/06/03	33	47
03486647	Vich	Lam	10/16/02	10/17/02	12/17/02	02/26/03	60	70
03486795	Savonn	Yonn	10/19/02	10/21/02	01/02/03	02/03/03	72	31
03487016	Diana	Phanthavong	10/23/02	10/28/02	01/08/03	02/12/03	71	34
03487016	Rida	Chum	10/23/02	10/28/02	12/02/02	01/22/03	34	50
03487193	Sophannee	Uy	10/26/02	10/28/02	11/08/02	12/05/02	10	26
03480962	Chea	Theng	11/18/02	11/21/02	12/26/02	02/10/03	34	45
03481235	Sally	Kong	11/27/02	11/27/02	01/07/03	02/24/03	40	47
03481654	Mao	Ngeth	12/13/02	12/16/02	02/20/03	04/09/03	65	47
03481654	Nhoeun	Hem	12/13/02	12/16/02	01/20/03	03/18/03	34	56
03481722	Sarom	Him	12/12/02	12/16/02	01/27/03	N/A	41	N/A
03487193	Sakun	Sam	10/26/02	12/28/02	12/10/02	02/06/03	42	57
03490345	Rithy	Mao	12/26/02	12/30/02	03/03/03	04/10/03	62	37
03482803	Thaverei	Veuk	01/21/03	01/21/03	02/27/03	04/24/03	36	55
03482803	Sareth	Veuk	01/21/03	01/21/03	03/03/03	04/24/03	40	51
03483246	Phath	Sim	02/07/03	02/07/03	03/20/03	04/22/03	40	32
03483838	Sokean	Phlong	02/14/03	02/18/03	03/26/03	05/07/03	35	41
03483838	Brandon	Ouer	02/14/03	02/18/03	03/26/03	04/29/03	35	33
03500338	Jimmy	Rom	03/24/03	03/25/03	06/09/03	N/A	75	N/A
03500338	John	Rom	03/24/03	03/25/03	05/09/03	N/A	44	N/A
03500338	Kong	Liv	03/24/03	03/25/03	05/12/03	06/30/03	47	48
03500623	Channak	Phal	03/28/03	03/31/03	04/28/03	06/04/03	27	36
03504357	Sokhon	Sem	06/03/03	06/04/03	07/17/03	11/11/03	42	116
03504615	Kimsan	Mom	06/07/03	06/12/03	08/11/03	09/24/03	59	43
03504615	Vanneck	Chea	06/07/03	06/12/03	09/11/03	11/06/03	90	55
03506013	Sokunthea	Eang	06/12/03	06/16/03	08/26/03	N/A	70	N/A
03505976	Keo	Kothpratoum	06/28/03	06/30/03	08/07/03	11/13/03	37	97
03505976	Vanta	Phanthanousi	06/28/03	06/30/03	08/07/03	10/27/03	37	80
03506712	John	Rom	07/11/03	07/14/03	08/13/03	09/30/03	29	47
03506712	Liv	Kong	07/11/03	07/14/03	08/13/03	N/A	29	-
03510448	Kim	Sambath	07/26/03	07/30/03	11/13/03	12/29/03	105	45
03510448	Samnang	Sok	07/26/03	07/30/03	09/16/03	01/13/04	47	118
03510448	Sophannara	Eang	07/26/03	07/30/03	12/11/03	02/16/04	133	66
03508820	Katherine	Mam	08/12/03	08/13/03	09/15/03	10/28/03	32	42
03508820	Linda	Nuth	08/12/03	08/13/03	09/15/03	10/28/03	32	42
03508820	Kimsat	Nuth	08/12/03	08/13/03	09/16/03	10/28/03	33	41
03511086	Morn	Samith	09/18/03	09/22/03	10/23/03	N/A	30	N/A
03513997	Chareth	Rath	10/27/03	10/28/03	12/08/03	03/15/04	40	97
03513997	Kristina	Rath	10/27/03	10/28/03	12/01/03	01/09/04	33	38

FRAUDULENT RE-EXAMS								
<u>CLAIM NUMBER</u>	<u>CLAIMANT FIRST NAME</u>	<u>CLAIMANT LAST NAME</u>	<u>DATE OF LOSS</u>	<u>INITIAL EXAM</u>	<u>RE-EXAM #1</u>	<u>RE-EXAM #2</u>	<u>DAYS BETWEEN D.O.I.E. & D.O.R.E. #1</u>	<u>DAYS BETWEEN D.O.R.E. #1 & D.O.R.E. #2</u>
03513997	Saleen	Phan	10/27/03	10/28/03	12/16/03	02/09/04	48	54
03513997	Vongdeane	Khiaosoth	10/27/03	10/28/03	11/12/03	12/01/03	380	18
03514331	Chhat	Phim	11/07/03	11/13/03	12/23/03	Unknown	39	N/A
03530556	Ken	Truong	12/10/03	01/07/04	03/05/04	04/15/04	57	40
03532767	Demetri	Molina	01/10/04	01/13/04	02/24/04	05/13/04	41	78
03532767	Robert	Delavalle	01/10/04	01/13/04	03/18/04	07/27/04	64	130
03532353	Pat	Song	01/03/04	01/14/04	02/11/04	04/26/04	27	74
03533438	Michael	Inthabane	01/19/04	01/22/04	04/06/04	05/26/04	74	49
03536789	Savy	Vong	03/16/04	03/18/04	04/26/04	06/03/04	38	37
03540127	Sam	Sok	05/14/04	05/17/04	06/16/04	08/02/04	29	46

A. EXEMPLAR CLAIMS

118. By way of example only, the following claims illustrate defendants' pattern and practice of creating and submitting false medical documentation to Encompass through the U.S. Mail to obtain insurance proceeds. In each of the following exemplars, defendants were operating through First Spine (i.e., alleged rendering of chiropractic treatment) and Future Management (i.e., generation and collection of medical invoices). All of the Encompass payments referenced in this Complaint were made in reliance upon the false medical documentation created and advanced by defendants.

**1. Claimant(s): Aun Sok, Prach Phon, Thorng Ream
DOL: 10/02/04**

119. In connection with Encompass' claim no. 03549524, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

120. The automobile reconstruction report indicates that this was an exceptionally low-speed accident.

121. Aun Sok is a 56 year old female who was declared totally disabled and received 43 excessive treatments over 90 days.

122. Defendants' chiropractic record indicates no prior accidents, but Encompass' investigation reveals numerous prior accidents.

123. Prach Phon also received 46 excessive treatments over 100 days.

124. Thorng Ream is a 78 year old female who was declared totally disabled and received 46 excessive treatments over 100 days.

125. The defendants' billed Encompass for 19 spinal manipulations purportedly provided to Thorng Ream, who denied ever receiving spinal manipulation treatment at First Spine.

126. In fact, Ms. Ream denies ever being seen or touched by a chiropractor.

127. The defendants billed Encompass for an initial examination and re-evaluation in connection with Ms. Ream. She denied being examined and/or evaluated by a doctor or chiropractor while treating at First Spine.

128. Thorng Ream was provided with an inducement by the defendants in exchange for treating at First Spine.

**2. Claimant(s): Chareth Rath, Kan Peov, Kristina Rath, Saleen Phan,
Vongdeaone Khiaosoth
DOL: 10/27/03**

129. In connection with Encompass claim no. 03513997, defendants created and submitted false medical documentation in furtherance of five claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

130. The claimants, ranging from 11 years of age to 42 years of age, purportedly received chiropractic treatment at First Spine from defendants McConnell and Culliney.

131. Accident data revealed that the alleged automobile collision resulted in less than \$200 damage.

132. All five claimants presented to First Spine on October 28, 2003 and received the exact same initial evaluation and follow-up treatment for approximately 48 excessive appointments over the course of 125 days.

133. First Spine delayed reexamination of all five claimants until they had all received excessive treatment.

134. In furtherance of its investigation and evaluation of the claim presented, Encompass requested that the five claimants submit to an examination under oath pursuant to the express terms of the policy contract under which they sought benefits. All of the claimants failed to appear for their duly scheduled examinations under oath.

135. On November 24, 2003, June 17, 2004, August 13, 2004, July 22, 2004, and March 3, 2005, Encompass received through the U.S. Mail false medical documentation created by defendants in connection with Vongdeyan Khiasoth's claim.

136. On June 4, 2004, Encompass paid Vongdeyane Khiasoth's medical bills in the amount of \$867 remitted by check through the U.S. Mail.

137. On November 24, 2003, and June 24, 2004, Encompass received false medical documentation created by defendants in connection with the treatment allegedly rendered to Kristina Rath through the U.S. Mail.

138. On June 1, 2004, Encompass paid Kristina Rath's medical bills in the amount of \$862, remitted by check through the U.S. Mail.

139. On November 24, 2003, Encompass received false medical documentation through the U.S. Mail in connection with the treatment allegedly rendered to Kan Peov.

140. Encompass paid Kan Peov's medical bills in the amount of \$862, by check through the U.S. Mail on or about June 1, 2004.

141. Encompass received false medical documentation through the U.S. Mail on February 18, 2004, and June 17, 2004, in connection with the treatment allegedly rendered to Saleen Phan.

142. Encompass paid Saleen Phan's medical bills in the amount of \$2,302, submitted by check through the U.S. Mail on or about June 4, 2004.

3. Claimant(s): Den Tith
DOL: 10/16/02

143. In connection with Encompass claim no. 03486642, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

144. The accident allegedly occurred at 7:40 a.m., following which the insured's vehicle was towed from the accident scene.

145. Den Tith presented to First Spine later that morning, complaining of pain in four (4) regions of his body.

146. Tith purportedly received chiropractic treatment administered by and/or supervised by defendants McConnell and Culliney.

147. Later on the date of the alleged accident, (and after allegedly commencing chiropractic treatment), Mr. Tith was referred back to the hospital by First Spine to undergo x-rays.

148. First Spine generated records and invoices containing excessive CPT upcoded billing in connection with its initial evaluation of Mr. Tith.

149. Thereafter, Mr. Tith returned to First Spine on forty-four (44) occasions over the course of 105 days, which constitutes grossly excessive treatment, amassing medical charges in excess of \$4,700.

150. Although Mr. Tith's insurance benefit application was submitted one day following the alleged loss, First Spine delayed submission of Tith's medical bills until Tith reached the Massachusetts tort threshold.

151. Encompass received First Spine-created false medical documentation through the U.S. Mail on October 17, 2002, December 27, 2002, January 27, 2003, and February 11, 2003.

152. Encompass remitted payments by check in the amount of \$440 on January 29, 2003, \$115 on March 24, 2003, \$440 on January 15, 2003, \$2,270 on January 31, 2003, and \$1,015 on March 6, 2003, \$1,435 on March 24, 2003, which payments traveled through the U.S. Mail.

4. Claimant(s): Samnang Ngeth; Sitha Mam, Sitha Ngeth
DOL: 03/15/02

153. In connection with Encompass claim no. 03468665, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

154. All three of the teenage claimants reportedly presented to First Spine on March 19, 2002.

155. Although accident report data indicated that none of the claimants were seat-belted at the time of the alleged collision, First Spine records indicate that all claimants were restrained at impact.

156. Accident report data indicates that the collision was a front-end impact caused by a second vehicle. First Spine records indicate that the injuries resulted from a rear-end impact.

157. According to First Spine documentation, all claimants complained of pain/injury in three-four body parts.

158. First Spine generated records and invoices with excessive CPT-coded bills in connection with the initial examination of claimants.

159. Defendants delayed reexamination for an identical period of time in connection with each of the claimants

160. The claimants purportedly received excessive treatment on 47-49 separate appointments over 120 days, with each claimant amassing First Spine medical bills in excess of \$4,700.

161. The Lowell Police Report indicates there were no injuries resulting from the alleged collision.

162. All the claimants were deemed totally disabled at the time of their presentment to First Spine, despite the fact that none of the claimants were employed full time, if at all.

163. Submission of First Spine treatment records and invoices to Encompass was delayed by 6 months following the loss, until the claimants exceeded the Massachusetts tort threshold.

164. On September 30, 2002, First Spine false medical documentation was submitted through the U.S. Mail to Encompass in connection with treatment allegedly rendered to Sitha Ngeth and Sitha Mam.

165. On November 2, 2002, First Spine records and invoices concerning treatment purportedly rendered to Samnang Ngeth were submitted through the U.S. Mail to Encompass.

166. By mailing a check on or about April 3, 2003, Encompass paid \$4,894 in connection with treatment purportedly rendered to Sitha Mam.

167. By mailing a check on December 29, 2003, Encompass paid \$423 in connection with treatment purportedly rendered to Sitha Ngeth.

168. By mailing a check on April 3, 2003, Encompass paid \$4,431 in connection with treatment purportedly rendered to Sitha Ngeth.

169. By mailing a check on April 9, 2003, Encompass paid \$4,754 in connection with treatment purportedly rendered to Samnang Ngeth.

5. Claimant(s): Anthony Arias, Alma Carrasquillo, Demetri Molina, Robert Delavalle
DOL: 01/10/04

170. In connection with Encompass claim no. 03532767, defendants created and submitted false medical documentation in furtherance of five claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

171. The claimants ranged in age from 8 to 51.

172. Three of the four claimants were minors at the time of the accident.
173. All claimants presented to First Spine within 3 days of the alleged accident.
174. All claimants received the same treatment modalities.
175. All claimants' reevaluations were delayed for an identical period of time.
176. First Spine delayed submission of medical bills to Encompass until all claimants exceeded the Massachusetts tort threshold.
177. The treatment purportedly rendered to each claimant was supervised by McConnell and Culliney.
178. On April 16, 2004 and April 30, 2004, Encompass received through the U.S. Mail medical records and bills in connection with treatment allegedly rendered to Alma Carrasquillo.
179. On April 15, 2004, April 16, 2004 and April 27, 2004, Encompass received through the U.S. Mail medical records and bills in connection with treatment allegedly rendered to Anthony Arias.
180. On March 22, 2004, March 30, 2004, April 16, 2004 and April 30, 2004, Encompass received through the U.S. Mail medical records and bills in connection with treatment allegedly rendered to Dimitri Molena.
181. On March 15, 2004, March 30, 2004, April 16, 2004 and April 30, 2004, Encompass received through the U.S. Mail medical records and bills in connection with treatment allegedly rendered to Roberto Delvalle.

182. Encompass paid First Spine's bills in the amount of \$1,740 on April 12, 2004, in connection with the treatment allegedly rendered to Roberto Delvalle, which payment traveled through the U.S. Mail.

183. Encompass paid First Spine's bills in the amount of \$2,525 on April 12, 2004, in connection with the treatment allegedly rendered to Dimitri Molena, which payment traveled through the U.S. Mail.

184. Encompass paid First Spine's bills in the amount of \$1,740 on October 13, 2004, in connection with the treatment allegedly rendered to Roberto Delvalle, which payment traveled through the U.S. Mail.

185. Encompass paid First Spine's bills in the amount of \$2,385 on April 12, 2004, in connection with the treatment allegedly rendered to Alma Carrasquillo, which payment traveled through the U.S. Mail.

6. Claimant(s): Chhang Kang, Chanda Kong, Phala Phoun
DOL: 06/04/02

186. In connection with Encompass claim no. 03465736, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

187. Each of the claimants, ranging in age from 20 to 64 years of age, allegedly complained of pain/injury in five (5) body parts.

188. The vehicle involved in the alleged collision sustained minimal damage.

189. The medical records created by the defendants failed to document the mechanism of injury.

190. First Spine medical records indicate that all claimants received excessive CPT-coded initial evaluations.

191. Following commencement of treatment, all three claimants were referred by First Spine to obtain x-rays.

192. The medical records created by the defendants, through First Spine, contained false information regarding prior medical history/condition of the claimants.

193. All claimants received identical treatment on at least forty-five (45) separate visits, amassing First Spine medicals in excess of \$4,800 per claimant.

194. On August 16, 2002, August 23, 2002, October 7, 2002, and October 25, 2002, Encompass received through the U.S. Mail First Spine false medical documentation demanding payment for treatment allegedly rendered to Chhang Kong.

195. On August 16, 2002, August 23, 2002, October 7, 2002, and October 25, 2002, Encompass received through the U.S. Mail First Spine false medical documentation demanding payment for treatment allegedly rendered to Chanda Kong.

196. On July 16, 2002, July 22, 2002, August 16, 2002, September 9, 2002, and October 15, 2002, Encompass received through the U.S. Mail First Spine false medical documentation demanding payment for treatment allegedly rendered to Chhang Kong.

197. On July 16, 2002, August 15, 2002, and October 29, 2002, Encompass received through the U.S. Mail First Spine false medical documentation demanding payment for treatment allegedly rendered to Phala Phoun.

198. Encompass remitted payment through the U.S. Mail on September 11, 2002, in the amount of \$1,725 for treatment allegedly rendered to Phala Phoun.

199. Encompass remitted payment through the U.S. Mail on September 6, 2002, in the amount of \$2,456 for treatment allegedly rendered to Chhang Kang.

200. Encompass remitted payment through the U.S. Mail on September 20, 2002, in the amount of \$1,045 for treatment allegedly rendered to Chhang Kang.

201. Encompass remitted payment through the U.S. Mail on December 31, 2002, in the amount of \$1,281 for treatment allegedly rendered to Chanda Kong.

202. Encompass remitted payment through the U.S. Mail on September 20, 2002, in the amount of \$1,521 for treatment allegedly rendered to Phala Phoun.

203. Encompass remitted payment through the U.S. Mail on December 31, 2002, in the amount of \$1,890 for treatment allegedly rendered to Chanda Kong.

204. Encompass remitted payment through the U.S. Mail on January 14, 2003, in the amount of \$1,135 for treatment allegedly rendered to Chhang Kang.

205. Encompass remitted payment through the U.S. Mail on January 14, 2003, in the amount of \$1,195 for treatment allegedly rendered to Chanda Kong.

206. Encompass remitted payment through the U.S. Mail on February 26, 2004, in the amount of \$530 for treatment allegedly rendered to Chanda Kong.

7. Claimant(s): Sokean Phlong, Brandon Ouer
DOL: 02/14/03

207. In connection with Encompass claim no. 03483838, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

208. Following an alleged collision on February 14, 2003, the claimants presented to First Spine where they each received identical evaluations and subsequent medical treatment administered and/or supervised by defendants Culliney and McConnell.

209. First Spine delayed reevaluation of both claimants for an identical period of 18 dates of service.

210. Incredibly, Brandon Oeur (5) purportedly received 26 dates of service under the chiropractic supervision of chiropractors McConnell and Culliney during which he allegedly received treatment and modalities including electric muscle stimulation and a “thermal-agent”. Based upon the defendants’ documentation, all of the treatment is excessive, unwarranted and unreasonable.

211. The defendants delayed submission of medical records and bills in connection with Phlong and Oeur until both claimants met or exceeded the Massachusetts tort threshold.

212. The medical records advanced by defendants indicate that Phlong was totally disabled despite the fact that she reported in her application for insurance benefits that she sustained no lost wages or missed any time from work.

213. Encompass received via the U.S. Mail on May 20, 2003, and October 7, 2003, false medical documentation created by the defendants in connection with Sokean Phlong’s claim.

214. Encompass received false medical documentation created by defendants through First Spine, via the U.S. Mail on April 7, 2003, April 22, 2003, February 26, 2004, and March 10, 2004, in connection with Brandon Oeur’s claim.

215. Encompass paid Brandon Oeur’s First Spine medical bills on May 14, 2003, in the amount of \$1,795.

216. Encompass paid Brandon Oeur’s First Spine medical bills on April 19, 2004, in the amount of \$1,083.

217. Encompass paid Sokean Phlong First Spine medical bills on April 21, 2003, in the amount of \$2,000.

218. Encompass paid Sokean Phlong First Spine medical bills on June 11, 2003, in the amount of \$102.

219. Encompass paid Sokean Phlong First Spine medical bills on November 6, 2003, in the amount of \$1,465.

8. Claimant(s): Sally Kong, Chinda Kruth
DOL: 11/27/02

220. In connection with Encompass claim no. 03481235, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

221. Both claimants (age 32, 33) alleged personal injury arising from a November 27, 2002, automobile accident, which resulted in total property damage of \$258

222. Both claimants presented to First Spine where they received identical evaluations and were then referred to the hospital emergency room for x-rays.

223. First Spine medical records failed to document the mechanism of injury.

224. The police report indicates that there were no injured parties in either vehicle.

225. Each claimant received nearly identical, excessive treatment over the course of at least forty-six (46) dates of service.

226. The chiropractic care allegedly rendered in connection with both claimants was administered or overseen by defendants Culliney and McConnell.

227. First Spine medical records falsely indicate that both claimants had negative prior medical/injury history.

228. The defendants delayed submission of the claimants' medical records and bills until each claimant had met or exceeded the Massachusetts tort threshold.

229. False medical documentation in connection with treatment allegedly rendered to Sally Kong was forwarded to Encompass through the U.S. Mail on January 17, 2003, January 27, 2003, April 21, 2003, May 12, 2003, June 4, 2003 and June 13, 2003.

230. False medical documentation in connection with treatment allegedly rendered to Chinda Kruth was forwarded to Encompass through the U.S. Mail on January 27, 2003, October 21, 2004, December 31, 2004, and February 9, 2005.

231. Encompass submitted payment of Sally Kong's medical bills through the U.S. Mail on February 17, 2003, in the amount of \$1,910.

232. Encompass submitted payment of Sally Kong's medical bills through the U.S. Mail on June 20, 2003, in the amount of \$295.

9. Claimant(s): Pamela Nou, Saroeun Hou
DOL: 09/06/01

233. In connection with Encompass claim no. 03456762, defendants created and submitted false medical documentation in furtherance of two claims advanced under Chinda Kruth's (see Sally Kong Claims, *supra*) automobile insurance policy with Encompass. See Exhibit 1.

234. On September 6, 2001, Pamela Nou and Saroeun Hou were allegedly injured while traveling in Kruth's vehicle, which sustained \$300 total damage.

235. Medical records created by First Spine failed to document the mechanism of alleged injury.

236. Subsequently, both claimants presented to First Spine within 4 days of the alleged accident complaining of pain/injury in five (5) areas of their bodies.

237. Claimants received identical, excessive treatment over the course of 47 separate dates of service, each amassing First Spine medical bills in excess of \$4,600.

238. The defendants delayed reevaluation of each claimant for an identical period of 18 days of treatment.

239. The claimants managed to submit applications for insurance benefits within one week of the alleged loss. First Spine, however, delayed submission of medical bills and records until each claimant had nearly met the Massachusetts tort threshold.

240. The chiropractic treatment allegedly rendered to both claimants was administered and/or supervised by defendants Culliney and McConnell.

241. The false medical documentation created by the defendants in connection with Pamela Nou's claim was received by Encompass through the U.S. Mail on December 18, 2002, December 31, 2002, January 6, 2003, January 21, 2003, January 27, 2003, and March 8, 2004.

242. The false medical documentation created by the defendants in connection with Hou's claim was received by Encompass through the U.S. Mail on July 12, 2002, August 12, 2002, October 18, 2002, March 9, 2004, and October 22, 2004.

243. Encompass paid Saroeun Hou's medical bills of \$2,789 by check through the U.S. Mail on January 30, 2002.

244. Encompass paid Pamela Hou's medical bills of \$973 by check through the U.S. Mail on March 7, 2002.

10. Claimant(s): Kosal Nguon, Sokcheath Prak, Sophalla Chum, Sophaly Chum
DOL: 12/14/98

245. In connection with Encompass claim no. 03381790, defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

246. Following a minimal-impact accident, all four claimants presented to First Spine.

247. The police report indicates that no person involved in the accident sustained physical injury. Notwithstanding, all four claimants reportedly received the highest CPT-coded evaluation--CPT 99205-- at First Spine, which is unwarranted.

248. First Spine records indicate that all claimants complained of pain/injury in four (4) regions of their bodies.

249. The defendants delayed reevaluation of each claimant for an identical period of service.

250. All claimants received excessive treatment consisting of 50-51 dates of chiropractic service.

251. First Spine documents provide that each claimant was totally disabled for 2-3 weeks.

252. First Spine delayed submission of medical records and bills demanding insurance payments until all claimants had well exceeded the Massachusetts tort threshold

253. On April 19, 1999, May 3, 1999, and May 20, 1999, Encompass received through the U.S. Mail false medical documentation created by the defendants in connection with treatment allegedly rendered to Nguon Kosal.

254. On March 19, 1999, May 17, 1999, and December 30, 1999, Encompass received through the U.S. Mail false medical documentation created by the defendants in connection with treatment allegedly rendered to Prak Sok Cheath.

255. On March 15, 1999, April 5, 1999, May 3, 1999, March 6, 2003, and March 10, 2003, Encompass received through the U.S. Mail false medical documentation created by the defendants in connection with treatment allegedly rendered to Suphala Chum.

256. On March 15, 1999, May 3, 1999, May 5, 1999, and May 19, 1999, Encompass received through the U.S. Mail false medical documentation created by the defendants in connection with treatment allegedly rendered to Sophaly Chum.

257. Encompass remitted payment through the U.S. Mail on February 17, 2000, in the amount of \$1,833 for Prak Sok Cheeth's First Spine medicals.

258. Encompass remitted payment through the U.S. Mail on March 30, 1999, in the amount of \$2,212 for Prak Sok Cheeth's First Spine medicals.

259. Encompass remitted payment through the U.S. Mail on November 27, 2001, in the amount of \$1,558 for Suphala Chum's First Spine medicals.

260. Encompass remitted payment through the U.S. Mail on November 27, 2001, in the amount of \$2,236 for Suphala Chum's First Spine medicals.

261. Encompass remitted payment through the U.S. Mail on March 30, 1999, in the amount of \$1,847 for Suphala Chum's First Spine medicals.

262. Encompass remitted payment through the U.S. Mail on March 30, 1999, in the amount of \$1,579 for Suphala Chum's First Spine medicals.

11. Claimant(s): Emmy Vann, Naravuth Mak, Narayuth Mak, Sandy Mak
DOL: 04/25/99

263. In connection with Encompass claim no. 03425232, the defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

264. The four claimants were minors ranging from 7 years of age to 12 years of age.

265. All four child claimants were restrained rear-seat passengers in the insured's 1989 Toyota Camry.

266. Total cost of repairs to the insured vehicle as a result of this minimal impact was \$335.

267. According to the police report, there were no injuries apparent or reported at the accident scene. However, an operator's report submitted in support of these claims indicated that all 4 children and 2 adult passengers sustained injury.

268. All four (4) minor claimants first presented to First Spine and commenced chiropractic treatment from defendant Culliney sixty-five (65) days after the alleged accident.

269. Medical records generated by the defendants indicate that all 4 minor claimants complained of pain/injury in three (3) areas of their bodies.

270. Despite the fact that (1) this was a minimal impact accident, and (2) all of the claimants reported for "treatment" more than 2 months post-accident, each claimant

received the highest level of complexity evaluation (CPT code 99205), which is unwarranted in light of defendants' medical documentation.

271. The defendants delayed reevaluation of each of the 4 minor claimants until at least the 18th day of service.

272. Each claimant allegedly received excessive treatment on at least twenty-eight (28) chiropractic appointments.

273. Incredibly, two of these minor claimants were declared totally disabled as a result of the loss.

274. The defendants delayed submission of medical records and bills to Encompass until all claimants met or exceeded the Massachusetts tort threshold.

275. Encompass received via the U.S. Mail false medical documentation created by the defendants by letters dated September 7, 1999, September 20, 1999, October 4, 1999 and October 18, 1999, in connection with chiropractic treatment allegedly rendered to Naravuth Mak.

276. Encompass received via the U.S. Mail false medical documentation created by the defendants by letters dated September 7, 1999, October 4, 1999 and October 18, 1999, in connection with chiropractic treatment allegedly rendered to Emmy Vann.

277. Encompass received via the U.S. Mail, false medical documentation created by defendants by letters dated September 7, 1999, and September 20, 1999, in connection with chiropractic treatment allegedly rendered to Sandy Mak.

278. Encompass received via the U.S. Mail false medical documentation created by defendants by letters dated September 7, 1999, September 20, 1999, and

December 13, 1999, in connection with chiropractic treatment allegedly rendered to Narayuth Mak.

279. Encompass remitted payment via the U.S. Mail on February 16, 2000, in the amount of \$150 for treatment allegedly rendered to Naravuth Mac.

280. Encompass remitted payment via the U.S. Mail on February 16, 2000, in the amount of \$150 for treatment allegedly rendered to Emmy Vann.

281. Encompass remitted payment via the U.S. Mail on June 26, 2000, in the amount of \$3,073 for treatment allegedly rendered to Narayuth Mak.

282. Encompass remitted payment via the U.S. Mail on February 16, 2000, in the amount of \$150 for treatment allegedly rendered to Sandy Mak.

283. Encompass remitted payment via the U.S. Mail on June 26, 2000, in the amount of \$1,866 for treatment allegedly rendered to Sandy Mak.

284. Encompass remitted payment via the U.S. Mail on June 26, 2000, in the amount of \$3,023 for treatment allegedly rendered to Emmy Vann.

285. Encompass remitted payment via the U.S. Mail on June 26, 2000, in the amount of \$2,763 for treatment allegedly rendered to Naravuth Mak.

12. Claimant(s): Tim Oeun
DOL: 09/22/01

286. In connection with Encompass claim no. 03457313, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

287. Mr. Oeun is alleged to have sustained severe personal injury in a minor automobile accident, following which he reported to First Spine complaining of pain and injury in five (5) body regions.

288. According to medical documentation created and advanced by defendants, Mr. Oeun was subjected to an initial examination and was declared totally disabled for (9) days.

289. Despite defendants' medical documentation, which appears to document a severely injured Oeun, he was "discharged" on his 18th visit to First Spine (contrary to the pattern of nearly every other First Spine automobile accident patient).

290. Further investigation revealed that on the day following his "discharge," Mr. Oeun was involved in a subsequent automobile accident on October 30, 2001 (for which he commenced yet another round of chiropractic treatment).

291. Despite treatment records (for the initial accident) indicating that Mr. Oeun's treatment frequency reduced as he progressed through treatment, Oeun actually received (or at least First Spine demanded payment in connection with) a treatment frequency of at least 3 times a week through the entirety of his alleged First Spine care related to claim no. 03457313.

292. The foregoing leads to the obvious conclusion that Oeun was treating and complaining of significant discomfort as of his eighteenth visit, but was discharged in order to allow Oeun to commence a new regimen of treatment in connection with the October 30, 2001 loss.

293. Mr. Oeun subsequently returned to First Spine in connection with yet another alleged motor vehicle accident occurring on October 13, 2004.

294. False medical documentation created and advanced by defendants was received by Encompass through U.S. Mail on January 18, 2002.

295. Encompass remitted payment via the U.S. Mail on September 12, 2002, in the amount of \$472.

296. Encompass remitted payment via the U.S. Mail on February 25, 2003 in the amount of \$1,315.

297. Mr. Oeun has been involved in and/or advanced auto insurance claims in connection with approximately ten automobile accidents.

298. In connection with nearly every accident, Mr. Oeun obtained treatment from defendant Culliney (or at least from a facility with which Culliney was associated).

299. Specifically, in connection with two automobile accident claims advanced in August 1994 and October 1996, Mr. Oeun purportedly received chiropractic treatment at World Family Chiropractic, Culliney's former employer. Defendant Culliney was later named as a defendant in a civil racketeering action brought in U.S. District Court (Massachusetts) against World Family Chiropractic.

300. Another former World Family Chiropractic employee, Socha Dy, followed Culliney and is currently employed by First Spine. At her deposition in the World Family case, Ms. Dy invoked her privilege against self-incrimination in response to all material questions.

13. Claimant(s): Chanthu Phauk, Jacriya Phauk, Melinda Phauk, Channara Phauk, Veda Phauk, Johnny Phauk, Taevy Phauk, Dika Phauk, Channate Phauk
DOL: 11/02/03

301. In connection with Encompass claim no. 03513995, defendants created and submitted false medical documentation for nine claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

302. Information provided by First Spine patients Chanthu Phauk, Jacriya Phauk, Melinda Phauk, Channara Phauk, Veda Phauk, Johnny Phauk, Taevy Phauk, Dika Phauk, Channate Phauk in connection with an automobile collision reportedly occurring on November 2, 2003, revealed evidence that defendants (1) billed for treatment that was not rendered (2) allegedly rendered treatment for injuries not complained of, and (3) allegedly provided treatment not related to the documented injury (heat therapy).

14. Claimant(s): Michael Pho
DOL: 05/28/01

303. In connection with Encompass claim no. 03445702, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

304. The police report indicates no injured parties.

305. Defendants' medical documentation falsely indicates that the patient was taken to the hospital after the accident. However, the patient did not go to the hospital until 12 hours later.

306. Emergency room records indicate no head trauma and normal gait. Defendants' records indicate head trauma with altered gait.

307. Hospital records indicate normal cervical range of motion. Defendants' records indicate diminished cervical range of motion in all planes.

308. Hospital records indicate negative straight-leg raise test. Defendants' records indicate positive straight leg-raise test.

309. Normal extremity or wrist and knee range of motion is noted at the hospital without any swelling. Defendants' records indicate evidence of swelling both in

the knee and the wrist. Defendants' reports also indicate that there was weakness both in the right upper extremity and left lower extremity without any specificity.

310. Defendants' record indicates head trauma. Dr. Culliney notes "I did not perform a cranial nerve examination today" without any other explanation. A cranial nerve examination would be an integral part of an examination if one actually did have head trauma with reported tenderness as is indicated in the chiropractic record.

311. Defendants' record indicates that it was Dr. Culliney's opinion based on the history and consultation "and review of this patient's medical records" that there was a direct causal relationship between the symptoms and the incident of May 28, 2001. However, no review of the patient's medical records occurred as one page earlier Dr. Culliney indicates "requested medical records and diagnostic studies" performed at Saints Memorial Medical Center in Lowell, Massachusetts.

15. Claimant(s): Nicki Phan and Bin Real
DOL: 04/02/01

312. In connection with Encompass claim no. 03420810, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

313. The police report (1) lists no one other than the driver, Nicki Phan, as involved in this accident; and (2) indicates no injured parties.

314. The loss notice executed by Nicki Phan does not list any witnesses or passengers.

315. The hospital records indicate that Bin Real is 75 years of age. Defendants' records describe her as a 35 year old female.

316. Nicki Plan received 43 treatments over 115 days. Bin Real received 42 treatments over 116 days. All of the treatment is unreasonable and/or excessive based on the chiropractic documentation.

317. Both patients are not re-evaluated until their 18th visit. A recipe of treatment is obvious given the fact that a 33 year old (Nicki Plan) and a 75 year old (Bin Real) received virtually identical courses of treatment. This recipe of treatment is substandard and designed to exceed the Massachusetts tort threshold whereas it fails to account for the individual needs of the patient.

318. Bin Real is determined to have sustained 10% permanent impairment without any meaningful documented basis.

319. Despite Bin Real's complaints of headache, the defendants failed to conduct a cranial nerve examination.

**16. Claimant(s): Chithra Ung, Pholla Long, Sophinnary Ung, Samnang San,
Volak Neang
DOL: 02/07/02**

320. In connection with Encompass claim no. 03467477, defendants created and submitted false medical documentation in furtherance of five claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

321. This motor vehicle collision involved five occupants ranging in age from 16-20, who complained of pain in 3-4 regions and all received a nearly identical (and excessive) regime of chiropractic care.

322. The invoices submitted by the defendants for these five claimants contain excessive (and non-compensable) billing for unwarranted CPT Codes (99205-99204) for an alleged initial examination.

323. The initial examination reports are substandard and fail to document the necessary mechanism of injury sufficient to find a causal relationship between the injuries purportedly complained of and the chiropractic care allegedly rendered.

17. Claimant(s): Sophoeun Kong
DOL: 11/26/00

324. In connection with Encompass' claim no. 03415524, defendants created and submitted false medical documentation in furtherance of a claim under an automobile policy of insurance with Encompass. See Exhibit 1.

325. Defendants' records note unremarkable previous history when, in fact, the patient was involved in two prior losses.

18. Claimant(s): Sitha Mam, Samnang Ngeth, Sitha Ngeth
DOL: 03/15/02

326. In connection with Encompass' claim no. 03468665, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

327. This motor vehicle collision involves three patients ages 16, 17 and 19 all reportedly involved in an accident in which the other vehicle backs into the front of their vehicle. The defendants' reports describe this as a rear-end accident.

328. The initial examination reports are substandard and fail to document the necessary mechanism of injury sufficient to find a causal relationship between the injuries purportedly complained of and the chiropractic care allegedly rendered.

329. All patients presented to the chiropractor on the same day (four days post-accident) and are billed for the highest complexity initial examination (CPT Code 99205), which is totally unwarranted based upon the medical documentation.

330. Despite differences in age, sex, medical condition, point of impact, position in the vehicle, prior medical history, etc., (1) all patients had 3-4 areas of complaint; (2) all patients received cervical and lumbosacral sprain/strain diagnosis, which would not be expected in these types of accidents in even one individual, let alone three and at this young age; (3) all patients received in excess of 47 chiropractic treatments in 4 months; and (4) all patients are totally disabled for a few days and then partially disabled until the end of treatment.

331. The defendants' final examination bill at CPT Code 99215 (the highest complexity re-evaluation), is not warranted and excessive.

332. The crash report provides that none of the First Spine patients were wearing seatbelts. The chiropractic records indicate that all of them were restrained.

19. Claimant(s): Sovanna Uy and Lath Uy
DOL: 09/18/02

333. In connection with Encompass' claim no. 03486571, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. Exhibit 1.

334. This was low speed accident resulted in \$575.00 rear-end damage to the claimant vehicle.

335. Both claimants presented to First Spine and were billed for CPT Code 99204 initial examinations which were not warranted and excessive.

336. The defendants' records relative to Sovanna Uy indicate that her past medical history was unremarkable when, in fact, she has a record of numerous prior injuries.

20. Claimant(s): Phen Chhon, Kim Sambath, Samnang Sok, Sophannara Eang
DOL: 07/26/03

337. In connection with Encompass' claim no. 03510448, defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

338. This motor vehicle collision involves four First Spine patients, Samnang Sok (age 23), Kim Sambath (age 19), Sophannara Eang (age 21) and Phen Chhon (age 28), whose vehicle was struck in the passenger side by a second vehicle that was backing up.

339. Samnang Sok, Kim Sambath and Sophannara Eang receive 46, 51 and 34 treatments between 150 – 240 days, despite the fact that the medical documentation is substandard and fails to document the treatment provided, amount billed or causal relationship.

340. Based on the First Spine medical documentation, given the ages of these individuals and the mechanism of injury described, the treatment was grossly excessive and not compensable.

21. Claimant(s): Nhem Ngeth and Hoeum Men
DOL: 01-20-01

341. In connection with Encompass' claim no. 03417806, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

342. Both First Spine patients present four days after the accident and allegedly received the highest complexity initial examination (CPT Code 99205), which was not

warranted based upon the medical documentation that described a de minimus, traffic accident with simple, non life-threatening injuries.

343. Defendants' records indicate that Nhem Ngeth movements about the office are painful and guarded, yet all ranges of motion are normal.

344. Both First Spine patients received in excess of 43 chiropractic treatments over four months, constituting excessive, unnecessary and unwarranted treatment.

345. The police report does not list Nhem Ngeth as an occupant in the vehicle.

22. Claimant(s): Ratha So, Phyrun Chhim
DOL: 05/16/01

346. In connection with Encompass' claim no. 03445338, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

347. First Spine records indicate that the vehicle was struck head-on by another motor vehicle, but fail to indicate that the other vehicle was backing up.

348. Both First Spine patients presented five and six days later and received the highest complexity initial examination (CPT Code 99205), which was not warranted, deceptive and fraudulent in light of the injury alleged in defendants' medical documentation.

349. Both First Spine patients allegedly received in excess of 47 chiropractic treatments, which was wholly unwarranted in light of the defendants' medical documentation.

23. Claimant(s): Sareth Heang, Cang Keo, Khawaii Sok, Kim Neang
DOL: 02/18/01

350. In connection with Encompass' claim no. 03419107, defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

351. Defendants' medical documentation indicates that all four patients were passengers. However, none are listed on the police report.

352. This was a front-end impact and the defendants' records differ among the four claimants. On 04/04/01, Cang Keo was sent to Associated Health Care Group (another Giampa clinic) and defendants' records indicate that the collision was a rear-end impact.

353. All First Spine patients present three days after the accident. Three of the First Spine patients allegedly received CPT upcoded initial examinations all of which were unwarranted in light of the medical documentation created by defendants.

24. Claimant(s): Sokhan Yang
DOL: 05/19/00

354. In connection with Encompass' claim no. 03439611, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

355. The records are false and misleading because they do not describe the accident accurately. The defendants' record falsely indicates that Sokhan Yang was driving through an intersection at the time of the collision. The Yang vehicle was struck by another vehicle that was hit and pushed into the Yang vehicle. The loss notice that

was reported by this individual indicates that his vehicle was stopped rather than driving through an intersection.

356. The defendants' reported the patient was considered totally disabled for 11 days. The personal injury protection form indicates that he missed no work.

357. The police report indicates no injury to anyone in the Yang vehicle.

358. First Spine billed Encompass for the highest complexity initial examination (CPT Code 99205), which was not warranted.

359. First Spine advised Mr. Yang to undergo x-rays at the hospital without any differential diagnosis justifying diagnostic testing.

360. Bolstering the conclusion that defendants adhered to an improper, preordained recipe of treatment absent any individual chiropractic decision making, despite Yang's objective symptoms, First Spine allegedly performed spinal manipulation, which is contra indicated in the circumstances.

361. Defendants' medical documentation fails to adequately report the mechanism of injury, a requirement to establish causal relationship. Accordingly, none of the chiropractic treatment allegedly rendered is compensable.

25. Claimant(s): Nikki Kim
DOL: 02-13-01

362. In connection with Encompass' claim no. 03418926, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

363. Ms. Kim was four months pregnant and received an evaluation with a complaint of neck, mid-back pain and low back pain as well as abdominal pain. Although this pregnant patient reports abdominal pain, the initial note of Dr. Culliney

indicates "I did not perform an examination of the abdominal region nor did I palpate the region today." Notwithstanding, First Spine billed Encompass for the highest complexity initial examination (CPT Code 99205), which was not warranted.

364. The diagnosis of cervical thoracic and lumbar sprain/strain was not consistent with the mechanism of injury.

365. Given the mechanism of injury, treatment consisting of 44 visits over 105 days was excessive whereas the treatment lasted beyond the expected resolution timeline *absent* medical intervention.

366. The First Spine recipe of excessive treatment with no nexus between treatment and symptoms and a lack of independent chiropractic decision making is clearly exemplified in analyzing Ms. Kim's claim. On 10/21/98, wherein her vehicle sustained approximately \$10,000 worth of damage, she received 48 treatments over 95 days. In the present accident, Ms. Kim is involved in a parking lot accident wherein another vehicle backed into her vehicle and she received 44 treatments over 105 days. In both instances, First Spine fraudulently billed Encompass for the highest complexity initial examination (CPT Code 99205), which in both cases was not warranted.

26. Claimant(s): Sophannee Uy
DOL: 04/15/03

367. In connection with Encompass' claim no. 03491088, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

368. The First Spine documentation reports Sophannee Uy as the driver. The automobile loss notice indicates that she was the passenger.

369. Dr. McConnell noted in her initial examination that the patient's previous history is unremarkable and failed to mention an October 2002 motor vehicle accident.

370. Based on the information contained within the chiropractic documentation, none of the First Spine treatment is compensable.

27. Claimant(s): Dara Lay, Khon Lay
DOL: 04/15/02

371. In connection with Encompass' claim no. 03469757, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

372. The First Spine documentation inaccurately describes this as a rear-end impact.

373. Given the false history obtained, it is impossible to determine a causal relationship and accordingly none of the chiropractic treatment is compensable.

374. The length of treatment and amount of treatment exceeds what is reasonable or what would be expected for the sixteen and eighteen year old individuals allegedly involved in this side-swipe type accident.

28. Claimant(s): Sunnak Chiv, Vandary Seng, Muth Seng, Sivinary Seng
DOL: 08/14/01

375. In connection with Encompass' claim no. 03448910, defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

376. This motor vehicle accident involved four occupants (ages 8, 10, 33, and 46) all presenting to First Spine one day following the alleged loss.

377. The 8, 10 and 33 year old patients received in excess of 40 treatments involving over utilization of supportive modalities including electrical stimulation, thermal agents and manipulation.

378. The 46 year old patient reported head trauma and presented complaining of headache and received an upcoded initial examination (CPT code 99204), which does not include cranial nerve testing.

**29. Claimant(s): Khen Khut, Chamroeun Sok, Mary Hean, Oeun Men,
Sart Sok
DOL: 04/01/01**

379. In connection with Encompass' claim no. 03420777, defendants created and submitted false medical documentation in furtherance of five claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

380. This motor vehicle collision involved two children, Mary Hean (13) and Chamroeun Sok (15). Both presented 10 days later to First Spine and received the highest complexity initial examination (CPT Code 99205), which is not warranted. Both patients received 22 treatments over approximately 55 days.

381. Treatment is excessive given the mechanism of injury and the ages of the patient and exceeded the expected resolution even without medical intervention.

382. Sok's initial report indicates that the patient will be re-evaluated every three to four weeks. First re-evaluation does not occur until seven weeks later.

383. Sok received 31 treatments over 75 days, which is excessive for a 21 year old given the data reviewed and whereas a natural resolution would occur typically within four weeks without any medical intervention.

384. Oeun Men is a 50 year old female who received an initial evaluation by Dr. Culliney on 04-09-01 at First Spine Lowell and then received an initial evaluation 3 days later at First Spine Fitchburg (another Giampa clinic) without any reference to the 04-09-01 evaluation in Lowell. Men presented on June 20th at Associated Health Care Group (another Giampa clinic) and is referred to as a male throughout the report. On 5-23-01, she was seen at the Associated Health Care Group and referred to as a female.

30. Claimant(s): Lan Lim
DOL: 02/19/00

385. In connection with Encompass' claim no. 03436611, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

386. The defendants' falsely reported that Lim was taken to Lowell General hospital. The police report indicates only the adverse operator was injured and taken to the hospital.

387. The defendants' falsely report a negative previous medical history when, in fact, Lim had a previous accident resulting in injury.

31. Claimant(s): Radet Yam
DOL: 08/29/00

388. In connection with Encompass' claim no. 03392271, defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

389. Radet Yam was not listed as an occupant of either vehicle on the police report.

390. First Spine billed Encompass for the highest complexity initial examination (CPT Code 99205), which was not warranted.

391. First Spine's treatment was excessive consisting of 42 visits over 165 days even though the personal injury protection form was reportedly signed three months earlier. 42 visits over 165 days represent approximately 2.5% improvement per visit. Radet Yam is noted to be improving slowly during the 10-26-00 re-examination by Dr. McConnell although the office notes indicate that he is responding well or reasonably.

32. Claimant(s): Ken Truong
DOL: 12/10/03

392. In connection with Encompass' claim no. 03530556, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

393. None of the chiropractic treatments purportedly provided to Ken Truong are compensable whereas: (1) the reports are misleading in that there are is no mention of prior accidents and according to Encompass' investigation (including an examination under oath), he was involved in three prior accidents; (2) this was a side-swipe accident and the diagnoses of cervical and lumbosacral sprain/strain are not consistent with the mechanism of injury described; (3) the mechanism of injury is not adequately described in the chiropractic records; and (4) Mr. Truong presented nearly a month after this accident and his complaints and findings are not consistent with a one month post-accident side-swipe presentation.

33. Claimant(s): Sakun Sam, Jennifer Tran, Sophannee Uy
DOL: 03/28/03

394. In connection with Encompass' claim no. 03487193, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

395. The chiropractic report indicates that the vehicle was struck by another vehicle without any other explanation or description.

396. The report is misleading and contradictory regarding Sakun Sam's movements. Carriage and gait are reported to be normal, yet the defendants' report that movement involving the neck and low back are guarded. The notes also report that movement around the office was unrestricted.

397. Although the patient complained of headache, no cranial nerve examination is performed. This fact alone indicates that the treatment provided by defendants was substandard and not compensable.

398. Cervical range of motion and orthopedic testing was not performed.

399. The First Spine treatment purportedly provided to Sakun Sam is excessive and consists of 48 treatments over 140 days.

400. The next report for Sophannee Uy involves a subsequent accident. She received treatment at this facility. The note indicates that the vehicle was rear-ended. Interestingly, range of motion and orthopedic testing of the neck and lower back were not performed because of the patient's discomfort, yet the defendants' medical record contains diagnoses of cervical and lumbosacral sprain/strain.

401. Sophanee Uy complained of headache, however no cranial nerve testing is performed even though defendants' medical documentation indicates that she is in so much pain that tests for the neck and low back could not be performed.

402. Uy and Tran's personal injury protection forms are dated three days after the accident. However, the forms were not sent out by the insurer until nearly two months after the accident so these were obviously back-dated.

34. Claimant(s): Vanta Phanthanousinh, Keo Kothpratoum
DOL: 06/28/03

403. In connection with Encompass' claim no. 03505976, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

404. The defendants' records contain subjective complaints and objective findings (including a total disability period of approximately 110 days) that are not consistent with the mechanism of injury.

405. The 46-47 chiropractic treatments allegedly rendered to these individuals was excessive given the mechanism of injury and presentations, which are not consistent with the mechanism of injury.

35. Claimant(s): Phyrun Chhim
DOL: 07/18/02

406. In connection with Encompass' claim no. 03474153, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

407. The records are misleading wherein they report only one prior accident when the individual is actually involved in three prior accidents.

408. The patient is noted to be unemployed yet considered totally disabled for six weeks.

409. The chiropractic records do not discuss the extent of the motor vehicle accident without any detail whatsoever. There is no report of seatbelt use in the chiropractic records.

410. Although Chhim reported head pain (and noted that he was "quite dazed"), the defendants failed to perform a cranial nerve examination.

411. The defendants submitted a bill for Chhim's examination at the second highest complexity initial examination CPT code (99204), which was unwarranted in light of defendants' medical documentation.

412. 47 chiropractic treatments over 135 days is not consistent with the anticipated natural course of resolution. The amount of treatment rendered and time elapsed is not commensurate with the level of improvement expected.

36. Claimant (s): Manila Panya
DOL: 04/19/02

413. In connection with Encompass' claim no. 03470054, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

414. Panya received at least 40 treatments, which is grossly excessive in light of the defendants' documentation. Astonishingly, four months following the collision, defendants were continuing to bill Encompass for three chiropractic treatments per week (11/18/02, 11/20/02, and 11/25/02).

**37. Claimant(s): Chareth Rath, Kan Peov, Kristina Rath, Saleen Phan,
Vongdeaone Khiaosoth
DOL: 10/27/03**

415. In connection with Encompass' claim no. 03513997, defendants created and submitted false medical documentation in furtherance of five claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

416. This very low speed, rear-end, collision caused \$200.00 damage and involved five claimants (ranging in age 11 to 42).

417. All five claimants presented to First Spine one day post-accident.

418. Kan Peov underwent an independent evaluation on 12/17/03. The examiner found evidence of symptom magnification.

419. Kristina Rath (11) received excessive treatment consisting of 48 treatments over 125 days involving overutilization of thermal agents and electrical stimulation. This patient is not re-examined until the 17th visit. She is treated with manipulation, thermal agent, electrical stimulation and subsequent traction. The treatment course is excessive for a minor and the necessity for utilization of modalities is unsupported in the defendants' chiropractic documentation.

420. The course of treatment far outlasts the natural resolution period and does not appear that the treatment rendered accelerated the natural history resolution for any of these individuals.

421. The fact that an 11 year old is noted to require 48 treatments over 4 months entirely undermines confidence in the validity of the other presentations as well.

422. The defendants' records regarding Vongdeaone Khiaosoth (36) fail to substantiate 45 treatments over approximately 120 days.

423. The defendants' records regarding Saleen Phan (33) fail to substantiate 46 treatments over approximately 120 days.

424. Although Phan presented with complaints of headache and nausea, no cranial nerve examination occurs.

425. She was sent for x-rays of the neck and back without any differential diagnosis.

426. The defendants' records regarding Chareth Rath (42) fail to substantiate 48 treatments over approximately 105 days.

427. Incredibly, five individuals were apparently determined to require this level of treatment all realizing little better than 2% improvement per visit, including that of an 11 year old, over the course of four months of treatment.

428. The treatment is excessive for these individuals as there is no clear outline regarding what exactly the outcome would be without treatment rendered.

38. Claimant(s): Ben Inthabane, Michael Inthabane
DOL: 01/19/04

429. In connection with Encompass' claim no. 03533438, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

430. Although both presented with complaints of headache (Michael Inthabane is diagnosed with post-concussion syndrome), no cranial nerve test is performed. Ben Inthabane also received a diagnosis of "acute headache, secondary to trauma" without any evidence of cranial nerve examination.

431. The defendants' report concerning Ben Inthabane dated 1/22/04 (three days post-accident) indicates that the patient missed one week of work.

432. The defendants' records refer to Ben Inthabane as both a male and female.

39. Claimant(s): Sam Sok
DOL: 05/14/04

433. In connection with Encompass' claim no. 03540127, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

434. This very low speed, rear-ended collision, resulting in \$315.00 damage, involves a 56 year old male.

435. Incredibly, the defendants treated Sam Sok 44 times over 100 days, resulting in approximately 2% improvement per visit, which does not comply with the likely expected outcome.

436. All treatment provided to Sok was excessive.

437. Total disability of 10 days is excessive in light of this patient's presentation, which is not consistent with the extent of the mechanism of injury.

438. Sok complained of headache, yet no cranial nerve examination is performed.

439. Interestingly, Sok was involved in a subsequent accident on 8/9/04, during the course of his treatment without any report in the chiropractic record. Sok was dismissed shortly thereafter on 8/24/04.

40. Claimant(s): Ly Chan, Pheakdey Sok
DOL: 10/02/02

440. In connection with Encompass' claim no. 03485991, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

441. This rear-end, motor vehicle accident results in no damage.
442. None of the chiropractic records discuss the extent of impact (or lack thereof).
443. Although Ly Chan (61) suffered a stroke three years previous, no cranial nerve testing is performed.
444. She received 40 treatments over approximately 120 days, which is grossly excessive.
445. She is determined to be totally disabled although unemployed. The period of totally disability is not reported.
446. Pheakdey Sok (24) received 46 chiropractic treatments over approximately 130 days which is excessive.
447. The treatment course far exceeds the otherwise expected natural history resolution.
448. The amount of treatment is not commensurate with the expected improvement.
- 41. Claimant(s): Ron Phay, Miriam Rivera, Susie Soeun**
DOL: 09/16/02
449. In connection with Encompass' claim no. 03485151, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.
450. This claim involved a two-car accident wherein the driver from one car and two occupants *from the second car* all presented at First Spine one day after the accident.

451. The First Spine records are misleading in the description of the accident as all three reports indicate that the vehicle in which they were traveling was struck by another vehicle.

452. Susie Soeun (20) received 46 treatments, which was grossly excessive.

453. Ron Phay (21) received 37 treatments, which was excessive.

454. Miriam Rivera (41) driver of the vehicle received 39 treatments, which was excessive.

455. Evidence of head trauma or complaints of head pain are noted with all three individuals, yet none of the evaluations include cranial nerve examination.

456. To avoid scrutiny, Miriam Rivera was referred to Associated Health Care Group (another Giampa clinic) and presented on 10-14-02 complaining of neck pain to the left side and limited mobility of the left shoulder with no diminished sensation of the left hand.

457. She returned on 11-11-02 now with pain reporting "decreasing right radiating pain."

458. She then returned on 12-2-02 with a mild deficit of sensation in the C5, C6 distribution of the right.

459. During the initial chiropractic evaluation on 9-17-02, increased sensation is noted at C6, C7, C8 dermatomes on the left.

460. The defendants' notes of 12-02-02 report decreased sensation of the left C6 dermatome.

461. Based upon the patient inconsistencies contained within the documentation submitted by Associated Health Care Group and First Spine (both Giampa clinics), none of the chiropractic care was justified or compensable.

42. Claimant(s): Sarath Ros, Bunthy Chantha
DOL: 02/13/02

462. In connection with Encompass' claim no. 03461410, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

463. Although both patients complained of headache (and one patient specifically has eye pain), neither patient received a cranial nerve examination.

464. The defendants' records regarding Bunthy Chantha are misleading and do not reference any prior accident while Encompass' investigation reveals one prior accident.

465. Subsequently, both individuals are involved in another accident on 1/22/03 (one year later). The defendants' report regarding Sarath Ros provide no previous history.

466. Bunthy Chantha was involved in his fourth accident in February of 2003.

467. Sarath Ros received 48 treatments over 5 months, which was excessive as a treatment course and outlasts the otherwise expected history for a natural resolution.

468. Bunthy Chantha apparently discontinued after 28 visits and then resumed visits sometime in March.

**43. Claimant(s): It Toun, Vibol Chhan, Dam Ny, Hun Hum, Jim Bun,
Tuy Pei, Chhoeum Yean**
DOL: 11/26/01

469. In connection with Encompass' claim no. 3459630, defendants created and submitted false medical documentation in furtherance of seven claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

470. Of the 5 First Spine patients, three presented to First Spine a day or two after the accident and received between 42 and 46 chiropractic treatments, which is grossly excessive.

471. All patients dismissed within 4 days of each other in mid-March 2002.

472. Another patient presented 60 days later as she sustained some fractures of the ankle as well as some ribs. She began treatment two months later and received excessive treatment consisting of 44 treatments over 120 days and dismissed on 5/13/02.

44. Claimant(s): Savy Vong
DOL: 03/16/04

473. In connection with Encompass' claim no. 03536789, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

474. Contrary to the crash report (completed 6/12/04 nearly three months after the accident), the defendants' chiropractic records indicate that she was rear-ended and pushed to the vehicle in front. The loss notice indicates only a two car accident.

475. The loss notice (completed one day post accident) indicates that no parties were injured.

476. Although Encompass' investigation revealed two prior accidents, defendants' chiropractic records do not reference any previous accidents.

477. Vong receives 46 treatments over approximately 110 days, which was excessive and exceeds the otherwise expected natural history resolution.

45. Claimant(s): Thaverei Veuk, Sareth Veuk, Thaverei Veuk
DOL: 01/21/03

478. In connection with Encompass' claim no. 03482803, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

479. The police report provides that no parties were injured, yet within hours both claimants present to First Spine with significant complaints. Notably, after their chiropractic visit they went to the hospital and were discharged at 3:00 p.m.

480. Thaverei Veuk (13) is described as a male consistently throughout the initial report. Subsequently, during re-evaluation reports she is referred to as a female. She received 52 treatments over approximately 4 months, which is excessive.

481. Thaverei Veuk was declared totally disabled per defendants' medical documentation for 9 days.

482. Sareth Veuk (44) received 53 treatments over about 4 months, which is excessive.

483. Unemployed Sareth Veuk was declared totally disabled for 7 days.

46. Claimant(s): Pramahaphun Jaemvimon, Anirut Khaunphet
DOL: 03/06/01

484. In connection with Encompass' claim no. 03482803, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

485. According to defendants' medical documentation, these two individuals are reported to be pedestrians that were struck by a vehicle that slid on snow.

486. The police report indicates one injured party.

487. Both claimants presented to First Spine one day post-accident stating that they were struck by the vehicle (contrary to the police report).

488. Pramahaphun Jaemvimon presented with complaints of headache and reported head trauma. No cranial nerve examination occurred.

489. Both patients received excessive courses of chiropractic treatment. Pramahaphun Jaemvimon received 47 visits over four months and was noted to be improving slowly. Anirut Khaunphet received 42 treatments through 7/2/01.

490. The course of treatment is excessive as it far outlasts the natural history to resolution that would likely be expected for these patients even without medical intervention.

47. Claimant(s): Synha Louangsabouth, Oeun Men
DOL: 11/14/04

491. In connection with Encompass' claim no. 03552226, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

492. The police report does not reference any occupants or passengers yet both claimants presented two days later to the chiropractor.

493. This was a very low speed accident causing \$328.00 worth of damage described as a scrape to the rear bumper.

494. The defendants' documentation regarding Oeun Men indicates no prior accidents. Encompass' investigation revealed at least one prior accident.

495. As of 2/28/05 (her 39th chiropractic visit), Oeun Men was noted to be improving but treatment will continue. She is subsequently involved in another accident the very next day on 3/1/05.

496. The defendants' documentation regarding Synha Louangsabouth reports one prior accident, however, Encompass' investigation reveals two.

497. Both patients were declared totally disabled per defendants' medical documentation, secondary to this \$328.00 accident.

498. The presentations were not consistent with the mechanism of injury as described.

499. The treatment course far exceeds the expected natural resolution period without medical intervention.

500. Synha Louangsabouth complained of headache, however, did not receive a cranial nerve evaluation.

501. The initial report from the chiropractor indicates a prior injury of the left shoulder secondary to a motor vehicle accident. The IME report notes right shoulder injury secondary to a 2002 motor vehicle accident.

48. Claimant(s): Amanda Ferullo
DOL: 11/04/04

502. In connection with Encompass' claim no. 03551639, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

503. Amanda Ferullo (21), a Future Management billing department employee, was represented by the same Boston-based personal injury attorney as the majority of patients from this Lowell clinic.

504. The Wage and Salary Verification Form signed by Daisy Foster indicates that she is employed at Data Entry Collections at Future Management. It indicates that she was out of work from 11-4-04 through 11-8-04, which is not consistent with the initial chiropractic report indicating that she did not miss any work.

505. During her examination under oath, she indicated no prior accidents however, Encompass' investigation revealed two prior accidents.

49. Claimant(s): Moch San, Sovanna Uy
DOL: 10/11/03

506. In connection with Encompass' claim no. 03512658, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

507. Sovanna Uy has eight prior motor vehicle accidents.

508. The initial report for Moch San is misleadingly reports no prior accidents when actually San was involved in at least 2 prior accidents (one occurring on 10-1-03 ten days prior to the 10-11-03 accident for which she received treatment).

509. Both patients received between 30-35 treatments, which were excessive given the mechanism of injury as described, as well as, their ages (24 and 21 years old).

50. Claimant(s): Alexander Men, Mike Sun
DOL: 02/07/05

510. In connection with Encompass' claim no. 03520242, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

511. Alexander Men is noted to be a restrained rear-seat passenger in a car involved in an accident without any other description in the chiropractic records.

512. Mr. Men is reported to have a benign previous history but records indicate one prior accident with treatment at the same chiropractic office in the year 2003. The record for Mr. Men does not reference any prior skeletal injury or accident history.

513. Mike Sun is noted to be a restrained front seat passenger in a car involved in an accident and reports cracking the windshield with his head in the chiropractic records. Although he presented with headaches and a history of head trauma, no cranial nerve examination is performed.

**51. Claimant(s): Dalin Ou, Michael Soum
DOL: 09/08/01**

514. In connection with Encompass' claim no. 03456832, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

515. Although Michael Soum (15) complained of headaches, defendants' chiropractic report indicates that Dr. Culliney did not perform a cranial nerve examination that day.

516. Both individuals were declared totally disabled and receive approximately 45 treatments over 4.5 months, which is grossly excessive.

517. Treatment was excessive and inconsistent with the normal expected course of natural resolution of 15 and 17 year old individuals given the presentations noted.

518. The course of treatment provided would account for a little more than 2% improvement per visit.

52. Claimant(s): Timmy Tim, Oeun Tim
DOL: 05/16/99

519. In connection with Encompass' claim no. 03425856, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

520. Oeun Tim also known as Tim Oeun has been involved in a number of collisions and received prior treatment at First Spine.

521. Police report indicates that there were no injuries and does not list any passengers.

522. Both Oeun Tim and Timmy Tim (6) present one day post-accident and receive the highest complexity initial examination (CPT code 99205), which was unwarranted.

523. Timmy Tim presented to First Spine with tenderness in the forehead and evidence of a hematoma. There is no evidence of a cranial nerve examination during his initial evaluation.

524. He received 32 treatments over approximately three months, which was excessive. The fact that a 6 year old is provided manipulation, traction, thermal agent and electrical stimulation entirely compromises the validity of the presentation of the adult occupant. The amount of treatment rendered is excessive, especially for a minor.

53. Claimant(s): Veun Long
DOL: 05/22/00

525. In connection with Encompass' claim no. 03439668, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

526. Veun Long is a 47 year old female in a side-swipe gas station accident. The defendants' chiropractic records indicate that the vehicle was broadsided, which is not accurate.

527. Long presented to First Spine on the date of loss. The defendants billed for the highest complexity initial examination (CPT code 99205), which is not warranted.

528. Long reported headache in the frontal aspect of the skull, yet no cranial nerve test is performed during this complex evaluation.

529. The previous history notes that the patient had left breast surgery with "removal of a lesion. It is not clear whether this was malignant or not". The date of the surgery to her left breast is not reported. Given the information reviewed this individual could not have been considered a reasonable candidate for chiropractic intervention without thorough data relative to the left breast surgery.

530. Although unemployed, Long was declared totally disabled for two weeks.

531. The defendants' chiropractic records do not adequately discuss the mechanism of injury undermining a causal relationship.

532. Long allegedly received electrical stimulation treatment, which would be contra-indicated with any patient with active cancer processes or recent cancer processes (which was not adequately ruled out).

533. The treatment is excessive given the mechanism of injury and the presentation is not consistent with the mechanism of injury.

54. Claimant(s): Chan Tim, Pheap Tim, Tob Lay, Vibol Tim
DOL: 05/24/01

534. In connection with Encompass' claim no. 03445658, defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

535. Pheap Tim and Tob Lay were under active treatment with regard to an accident on 4/19/01.

536. Following the 5/24/01 accident, all four individuals present one day post accident.

537. Incredibly, three-year old patient, Vibol Tim (3) underwent 24 chiropractic treatments including manipulation, thermal agent and electrical stimulation over 50 days and is noted to be progressing slowly. The 3 year old patient is not re-evaluated until the 18th visit. The fact that a 3 year old is determined to require 24 visits entirely compromises the validity of the presentation and any thought of individual decision making relative to the adult patients identified throughout this Complaint. This treatment is grossly excessive and unwarranted in light of the documented medical records.

538. The other three adults ages 31, 31 and 51 all received approximately 45 treatments over 100-110 days, which is excessive and unwarranted in light of the medical documentation.

539. Although the 31 year old female presented with reported lacerations, bruising of the face, swelling with report of constant headache and numbness in the top of her right shoulder to her elbow, no cranial nerve examination is performed.

540. First Spine billed Encompass in connection with all four patients at the highest complexity initial examination (CPT code 99205), which was not warranted.

55. Claimant(s): Marion Garcia, Paul Taylor
DOL: 01/30/02

541. In connection with Encompass' claim no. 03467194, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

542. The defendants' chiropractic documentation indicates that Marion Garcia has an essentially unremarkable previous history. Encompass' investigation revealed at least one prior accident.

543. The presentations of these two individuals for the same accident, considered collectively, are inconsistent with the mechanism of injury documented in defendants' medical documentation.

56. Claimant(s): Vich Lam
DOL: 10/16/02

544. In connection with Encompass' claim no. 03486647, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

545. First Spine billed Encompass for the second highest complexity initial examination (CPT code 99204), which was not warranted.

546. He complained of headache and his diagnosis is noted to be "consistent with post-concussive syndrome", yet no cranial nerve examination is performed.

547. Mr. Lam received 47 chiropractic visits over 6 months, which is excessive for a 23 year old individual given the diagnosis he is provided. The amount of treatment rendered constitutes approximately 2% improvement per visit.

548. The defendants' chiropractic records report a period of total disability of 7 days however, the personal injury protection form executed by Lam indicates no time missed from work.

57. Claimant(s): Kosal Nguon, Sokcheath Prak, Sophalla Chum, Sophally Chum
DOL: 12/14/98

549. In connection with Encompass' claim no. 03381790, defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

550. This motor vehicle collision involved 4 young persons ranging in age from 12-23. All received approximately 50 chiropractic treatments, which is entirely excessive in the circumstances documented in defendants' medical records for all of them especially the 15 year old individuals.

551. Police report indicates no injuries and no passengers.

552. The driver and three reported passengers apparently present to First Spine three days post-accident.

553. First Spine billed Encompass for all claimants the highest complexity initial examination (CPT code 99205), which was not warranted.

554. Sophally Chum is a 15 year old and presented to the hospital 2 days after the accident where she reported to have been unrestrained at the time of impact. Defendants' medical documentation indicates that Chum was wearing a seatbelt.

555. The defendants' medical documentation indicates no prior accidents when, in fact, Ms. Chum had two prior accidents.

556. Kosal Nguon chiropractic record indicates one prior accident. Encompass' investigation revealed four prior accidents.

557. The levels of disability reported and treatment rendered are entirely inconsistent and excessive given the ages of these patients, and the alleged mechanism of injury, as described.

58. Claimant(s): Peou Ing
DOL: 11/09/99

558. In connection with Encompass' claim no. 03432698, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

559. Peou Ing is a 24 year old female who was 16 weeks pregnant, a mother of five and a homemaker when she was involved in a very low speed motor vehicle accident.

560. Ms. Ing was seen at the hospital because of her pregnancy and dismissed.

561. Ms. Ing presented to First Spine complaining of headaches and vertigo, among other complaints, yet no cranial nerve examination is performed.

562. First Spine billed Encompass for the highest complexity initial examination (CPT code 99205), which is not warranted in light of defendants' medical documentation.

563. Defendants declared Ms. Ing totally disabled after this minor accident, following which she received 36 treatments through 4/10/00, which was excessive given the mechanism of injury and documented symptoms.

564. The discharge note indicates that the patient apparently lost her baby at some point and electrical stimulation was instituted in the lower back on 1/31/00. None of the office notes discuss this event.

59. Claimant(s): Emmy Vann, Naravuth Mak, Narayuth Mak, Sandy Mak, Run Phon, Yari Mak
DOL: 04/25/99

565. In connection with Encompass' claim no. 03425232, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

566. The children (7, 9, 11 and 12) presented more than two months post-accident to First Spine and all received the highest complexity initial examination (CPT Code 99205), which is unwarranted. None have any reduction of range of motion of the neck or back. Three of the four children were considered totally disabled for four days after the accident, which is ridiculous because they did not present to First Spine until 65 days post-accident.

567. Between them, the children received 142 treatment dates, consisting of manipulation and various passive modalities including electrical stimulation, thermal agent, and traction, which is unwarranted, excessive and unreasonable.

568. The accident resulted in \$335.00 damage.

569. The police report indicates no injuries.

570. The presentation of the children two months post-accident is not consistent with the reported mechanism of injury. The odds that any individual would be so injured to require formal treatments commencing two months post-accident are negligible. The odds that four individuals ranging in ages 7 through 12 would require between 28 and 39

chiropractic treatments commencing 65 days post-accident with modalities noted are astronomical.

60. Claimant(s): Sophay Porth, Phoeum Sam, Krapomroth Khim
DOL: 03/18/02

571. In connection with Encompass' claim no. 03468725, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

572. The chiropractic record indicates that Phoeum Sam (21) struck his head with his hand causing him to "lose consciousness for a short period of time".

573. First Spine billed Encompass for the highest complexity initial examination (CPT Code 99205) for all claimants, which is unwarranted.

574. Sophay Porth (16) has no reduction of neck or back range of motion during the examination.

575. Krapomroth Khim (21) also has no reduction of neck or back range of motion during the examination.

576. All have complaints of headache and received diagnoses of acute headache without any cranial nerve examination performed.

577. All of these individuals received between 47 and 49 chiropractic visits over 4-5 months. The treatment course is excessive as it exceeds the natural history of resolution to be expected in these conditions given the histories and presentations.

61. Claimant(s): Thanh Som
DOL: 02/17/01

578. In connection with Encompass' claim no. 03442397, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

579. Thanh Som presented to First Spine two days post-accident with complaints of headache and vertigo, yet defendants fail to perform a cranial nerve examination.

580. First Spine billed Encompass for the highest complexity initial examination (CPT Code 99205), which was unwarranted.

581. Defendants' declared Som totally disabled although the wage and salary verification form indicates no time missed from work.

582. 48 chiropractic treatments over 4 months, is grossly excessive in light of the documented alleged injury, symptoms and treatment.

62. Claimant(s): Sunnhak Chiv
DOL: 09/21/01

583. In connection with Encompass' claim no. 03457321, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

584. This claimant was under active care for a prior accident upon commencement of treatment at First Spine. However, defendants' medical documentation does not reference the pre-accident injury or treatment.

585. Chiv received 46 treatments over 135 days, which was grossly excessive and unwarranted.

63. Claimant(s): Sacha Tang, Viphearea Srey, Wilson Souangchack
DOL: 09/08/00

586. In connection with Encompass' claim no. 03402742, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

587. All claimants presented 17 days post-accident and allegedly received the highest complexity initial examination (CPT code 99205), which is unwarranted.

588. Each claimant allegedly complained of numerous complaints including headache. None received cranial nerve examination, despite one patient's complaint of pain and discomfort through the right eye "with the formation of blood, progressively worse since the accident".

589. All three claimants allegedly received between 29-47 chiropractor visits over the course of 6-8 months - - representing an alleged 2-3% improvement per visit. The amount of treatment rendered was excessive given defendants' medical documentation and exceeded the expected course of natural history resolution in young adults.

64. Claimant(s): Chanda Kong, Chhang Kang, Phala Phoun
DOL: 06/04/02

590. In connection with Encompass' claim no. 03465736, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

591. This accident was a very low speed, rear-end collision causing minor damage.

592. All three presented to First Spine 3 days post-accident and received upcoded initial examinations. After their First Spine evaluations, all allegedly presented to the hospital by 11:15 a.m. the same morning.

593. Chhang Kang is retired and unemployed, yet declared totally disabled and received excessive treatment consisting of 47 treatments over 100 days.

594. Chanda Kong is 20 years old, declared totally disabled although apparently unemployed, and received excessive treatment consisting of 46 treatments over 115 days.

595. Defendants' medical documentation indicates Kong had one prior accident, while Encompass' investigation revealed that Kong was involved in at least three prior similar accidents.

596. Phala Phoun received excessive treatment consisting of 46 treatments.

597. All claimants complained of headache among other complaints as well as pressure behind the eyes, yet do not undergo any cranial nerve examination.

65. Claimant(s): Kamsot Kong
DOL: 12/31/00

598. In connection with Encompass' claim no. 03417018, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

599. This accident occurred on New Year's Eve 2000 in a parking lot causing \$550.00 damage. The adverse vehicle backed up into Kong.

600. First Spine billed Encompass for the highest complexity initial examination (CPT code 99205), which was unwarranted.

601. Ms. Kong received excessive treatment consisting of 44 treatments over 4 months not commensurate with the mechanism of injury, age of the patient, and presentation. The patient's presentation includes no reduction of ranges of motion in the neck or back, yet somehow she was determined to have sustained sprain/strain of the cervical and lumbosacral regions as well as the need for 40+ chiropractic treatments.

66. Claimant(s): Veasna Ngeth, Samnang Ngeth
DOL: 06/25/00

602. In connection with Encompass' claim no. 03447628, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

603. This was a single vehicle accident.

604. Both minor patients were seen at the hospital and presented three days post-accident to First Spine receiving the highest complexity initial evaluations (CPT code 99205) by Dr. Culliney, which was unwarranted.

605. Defendants' medical documentation regarding Veasna Ngeth reports momentary loss of consciousness, though the patient denied loss of consciousness at the hospital and also denied neck and back pain at the hospital. Even though he allegedly reported head pain, head trauma and loss of consciousness during this evaluation, no cranial nerve testing was performed. In fact, Dr. Culliney notes the fact that he "did not perform cranial nerve exam nor did I perform a fundiscopy examination of the eyes" without any explanation.

606. Both patients received excessive treatment consisting of 44 treatments over approximately 100-110 days.

607. Veasna Ngeth is reported to be involved in a subsequent accident on 1-9-01. The treatment courses for these two individuals without any previous history of pain or accident or injury is excessive. It would not be expected that individuals of this age to require even half this amount of treatment given the data reviewed.

608. The treatment courses for both patients amounts to a little more than 2.5% improvement per session.

67. Claimant(s): Nhoen Hem, Mao Ngeth
DOL: 12/13/02

609. In connection with Encompass' claim no. 03481654, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

610. This was a side-swipe accident causing \$600.00 damage.

611. Defendants' medical documentation inaccurately reports the mechanism of injury.

612. Defendants' initial report indicates Nhoen Hem's prior history of a motor vehicle accident more than twenty years ago, while Encompass' investigation reveals an accident in January 2001.

613. Mao Ngeth is noted to be partially disabled throughout the entire term of 5 months and 44 treatments, which is unsupported in the documentation.

614. Hem is unemployed and also declared totally disabled.

615. The presentations are not consistent with the reported mechanism of injury.

**68. Claimant(s): Cheatra So, Nheop So, Paulika So, Phaectra So, Savuth Phan,
San Samnang, Alex Nunez
DOL: 02/24/02**

616. In connection with Encompass' claim no. 03462771, defendants created and submitted false medical documentation in furtherance of seven claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

617. Seven individuals reported in this accident involving a 1998 Jeep Grand Cherokee sustaining \$300.00 of rear-end damage.

618. The police report only identifies 6 individuals (missing San Samnang, a 20 year old).

619. Paulika So (10) allegedly received excessive treatment consisting of 48 treatments consisting of manipulation, thermal agent and electrical stimulation over approximately 4 months.

620. Phaectra So (13) presented two days post-accident and received excessive treatment consisting of 49 treatments over approximately 4 months, consisting of manipulation, thermal agent, and electrical stimulation during the early stages.

621. Cheatra So (14) received excessive treatment consisting of 47 treatments over approximately 4 months.

622. Savuth Phan (31) received excessive treatment consisting of 33 treatments over approximately 3 months.

623. Nheop So (39) is considered totally disabled, receiving 48 excessive treatments over approximately 4 months.

624. Thus, seven (7) individuals claiming to be occupants in a Jeep that is apparently rear-ended, sustaining \$332.65 damage and all received unwarranted and

excessive chiropractic intervention. The presentations of all reports that are presented are not consistent with the mechanism of injury as described.

**69. Claimant(s): Katherine Mam, Linda Nuth, Kimsat Nuth, Sothery Kull
DOL: 08/12/03**

625. In connection with Encompass' claim no. 03508820, defendants created and submitted false medical documentation in furtherance of four claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

626. All presented to First Spine one day following this low impact collision.

627. Katherine Mam (9) received 35 excessive, unwarranted treatments over approximately 2.5 months consisting of manipulation, thermal agent and electrical stimulation.

628. Linda Nuth (16) allegedly received approximately 45 excessive and unwarranted treatments over 4 months and is considered totally disabled.

629. Sothery Kull (19) allegedly received approximately 45 excessive and unwarranted treatments over 4 months and is considered totally disabled.

630. Kimsat Nuth (38) allegedly received approximately 45 excessive and unwarranted treatments over 4 months and is considered totally disabled.

631. The treatment allegedly rendered represents approximately 3% improvement per visit for a 9 year old and approximately 2% improvement for a 16, 19 and 38 year old individuals which is entirely not commensurate with the natural history to resolution that should be expedited with formal therapies.

70. Claimant(s): Song Taing
DOL: 08/03/02

632. In connection with Encompass' claim no. 03475016, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

633. Taing presented to the emergency room three days later, reporting that he underwent some "Asian cupping" of the involved areas of the lower back without any improvement. Taing received x-rays of the low back and receives a muscle strain diagnosis.

634. The next day he presented to First Spine and received an upcoded evaluation (CPT Code 99204) complaining of headache, low back pain and chest pain with some radiation to the left groin. The presentation is inconsistent regarding the complaint of headache, which was denied in the hospital records.

635. Taing allegedly received 46 chiropractic treatments. This treatment for an 18 year old is entirely excessive given the age, presentation and history of this event.

71. Claimant(s): Phallun Ork, Sokkeng Gen
DOL: 06/22/01

636. In connection with Encompass' claim no. 03446833, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

637. This is a very low speed rear-ended accident causing \$860.00 damage.

638. Forty-four (44) year old Phallun Ork and nineteen (19) year old Sokkeng Gen presented to the hospital at the same time, then presented together to First Spine three days post-accident.

639. During their presentations to the chiropractor they both noted pain between 7 and 10 of severity in three areas about the neck, mid back and low back.

640. Sokkeng Gen had no loss of range of motion in neck or back and received diagnosis of acute cervical thoracic and lumbosacral sprain/strain.

641. Phallun Ork had restricted range of motion of the neck and back in all planes although no values are provided and received diagnosis of acute cervical thoracic and lumbosacral sprain/strain.

642. Phallun Ork received 46 chiropractic treatments over 4 months. The chiropractic record is excessive given the mechanism of injury as documented in defendants' records. The presentation is not consistent with the mechanism of injury nor with the previous presentation at the hospital for either individual.

643. Phallun Ork was reported to be employed and was declared totally disabled in defendants' medical documentation. However, the personal injury protection form indicates no missed time from work.

644. Sokkeng Gen received 38 excessive treatments over approximately 3 months. This chiropractic record is not consistent with her presentation and her reported pain level is not consistent with the mechanism of injury as described.

72. Claimant(s): Vannsak Vath, Savan Vat
DOL: 04/04/02

645. In connection with Encompass' claim no. 03469371, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

646. Vannsak Vath is a 19 year old female reported as the vehicle operator on the police report.

647. Sopheun Ouch was a reported passenger.

648. No other occupants are reported on the police report.

649. The claimants' Report of Loss to Encompass falsely indicates that forty-six (46) year old Savan Vat was the driver of the insured vehicle.

650. Savan Vat and Vannsak Vath both presented to First Spine four days post-accident, and allegedly received approximately 20 dates of service over 3 months, which is excessive, unreasonable and unwarranted based upon the medical documentation.

73. Claimant(s): Roeun Kong, Sareth Nuon
DOL: 05/22/01

651. In connection with Encompass' claim no. 03411511, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

652. Roeun Kong is a 48 year old female. However, she is referred to as a male in the 6-27-01 orthopedic note from Dr. Mogal of Associated Health Care Group.

653. This was a side-swipe accident causing \$1300.00 worth of damage including parts and labor.

654. Roeun Kong and Sareth Nuon presented seven days post-accident and received upcoded initial evaluations.

655. Roeun Kong received excessive treatment consisting of 47 treatments over approximately 4 months.

656. Sareth Nuon received excessive treatment consisting of 49 treatments over approximately 5 months.

657. Their presentations are not consistent with the mechanism of injury as reported.

658. Defendants' chiropractic records indicate that the 15 year old struck internal components of the car and was dazed but denies losing complete consciousness. She complained of headaches and with this history no cranial nerve testing was performed or reported.

74. Claimant(s): Bin Suon, Ngeth Soeung
DOL: 11/18/00

659. In connection with Encompass' claim no. 03415264, defendants created and submitted false medical documentation in furtherance of three claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

660. Bin Suon is reported to be injured in the police report and is taken to the hospital. No other injuries are reported.

661. However, Suon and Soeung presented to First Spine and received upcoded initial evaluations.

662. Soeung was declared totally disabled for a period of 9 days through 11/27/00. However, an attached emergency room record indicates that he presented on 11-26-00 reporting an injury to his hand sustained at work. This is not mentioned in Defendants' chiropractic records.

663. The EMS records indicate that the vehicle in which these individuals were occupants sustained a small dent and scratch on the right side door.

664. Their presentations two days post accident are not consistent with this mechanism of injury.

665. Two to four weeks total disability for Bin Suon is incredible.

666. Defendants' medical documentation declaring Ngeth Soeung disabled is false given the fact that he continued working.

667. Both individuals received approximately 45 treatments over a period of 4 months. The level of treatment is excessive given the documented mechanism of injury, symptoms and treatment allegedly rendered.

75. Claimant(s): Hang Tran, Nguyet Nguyen
DOL: 01/09/98

668. In connection with Encompass' claim no. 033264112, defendants created and submitted false medical documentation in furtherance of two claims advanced under an automobile insurance policy with Encompass. See Exhibit 1.

669. A second vehicle backed into the Tran vehicle causing \$300.00 damage.

670. Tran and Nguyen both presented three days post-accident to First Spine and received upcoded initial evaluations (CPT code 99205).

671. Defendants' Nguyen report indicates benign muscular skeletal history. Encompass' investigation revealed two prior accidents.

76. Claimant(s): Punlork Sar; Jorge Diaz, Sambath Bo, Lysabad Bo, Samantha Mao, Samban Bo, Sambath Bo, Sambun Sar
DOL: 02/11/01

672. In connection with Encompass claim no. 03418795, defendants created and submitted false medical documentation in furtherance of seven claimants ranging from 7 years of age to 53 years of age advanced under an automobile insurance policy with Encompass. See Exhibit 1.

673. Coincidentally, not only did First Spine treat all the claimants in the vehicle owned and insured by Mr. Sar, First Spine also had the good fortune to allegedly render treatment to the driver of the adverse vehicle, Jorge Diaz.

674. The next day, all seven claimants (from both vehicles) allegedly received the highest complexity CPT-coded exams, which is unwarranted, at First Spine under the direction and supervision of defendants Culliney and McConnell.

675. The insured vehicle allegedly sustained \$900 in damage (parts and labor).

676. The false medical documentation advanced by First Spine failed to properly document the physical condition of the claimants.

677. The defendants delayed reexamination of all claimants, regardless of discrepancies in age, physical condition and alleged injury.

678. The seven-year-old claimant received excessive treatment consisting of 32 total dates of alleged chiropractic service amassing medical bills in excess of \$3,200. The 53 year old male driver of the adverse vehicle also received excessive treatment consisting of 32 dates of alleged chiropractic treatment and amassed in excess of \$3,100 in First Spine medical bills.

679. Despite the fact that all claimants appeared to have completed and submitted PIP Benefit applications on a timely basis, defendants delayed submission of false medical documentation until the claimants met or exceeded the Massachusetts tort threshold. See Exhibit 1.

680. First Spine medical records indicate that the adverse operator claimant had no relevant prior medical history. However, Encompass' investigation revealed a similar prior loss(es).

681. On about March 8, 2002, Encompass received through the U.S. Mail First Spine false medical documentation in connection with treatment allegedly rendered to Punlork Sar.

682. On about March 11, 2001, Encompass received through the U.S. Mail First Spine false medical documentation in connection with treatment allegedly rendered to Sambath Bo.

683. On about June 6, 2001, Encompass received through the U.S. Mail First Spine false medical documentation in connection with treatment allegedly rendered to Lysabad Bo.

684. On about June 6, 2001, Encompass received through the U.S. Mail First Spine false medical documentation in connection with treatment allegedly rendered to Samban Bo.

685. On about May 24, 2001, Encompass received through the U.S. Mail First Spine false medical documentation in connection with treatment allegedly rendered to Samentha Mao.

686. On about October 22, 2001, Encompass received through the U.S. Mail First Spine false medical documentation in connection with treatment allegedly rendered to Sambun Sar.

687. On September 3, 2002, November 5, 2002 and October 14, 2004, letters were sent by lawyers on behalf of First Spine to Encompass demanding payment in connection with chiropractic treatment allegedly rendered arising from the Punlork Sar collision.

688. Encompass remitted payment by check via the U.S. Mail on June 15, 2001, in the amount of \$1,818, for treatment allegedly related to Lysabad Bo.

689. Encompass remitted payment by check via the U.S. Mail on July 16, 2001, in the amount of \$2,105 for treatment allegedly related to Sambun Sar.

690. Encompass remitted payment by check via the U.S. Mail on June 15, 2001, in the amount of \$1,973 for treatment allegedly related to Sambun Sar.

691. Encompass remitted payment by check via the U.S. Mail on June 19, 2001, in the amount of \$1,150 for treatment allegedly related to Samentha Mao.

692. Encompass remitted payment by check via the U.S. Mail on June 15, 2001, in the amount of \$2,053 for treatment allegedly related to Samentha Mao.

693. Encompass remitted payment by check via the U.S. Mail on June 19, 2001, in the amount of \$2,220 for treatment allegedly related to Samban Bo.

694. Encompass remitted payment by check via the U.S. Mail on June 15, 2001, in the amount of \$1,878 for treatment allegedly related to Samban Bo.

695. Encompass remitted payment by check via the U.S. Mail on June 21, 2001, in the amount of \$1,400 for treatment allegedly related to Sambath Bo.

696. Encompass remitted payment by check via the U.S. Mail on June 21, 2001, in the amount of \$1,795 for treatment allegedly related to Lysabad Bo.

697. Encompass remitted payment by check via the U.S. Mail on June 15, 2001, in the amount of \$1,958 for treatment allegedly related to Sambath Bo.

698. Encompass remitted payment by check via the U.S. Mail on June 15, 2001, in the amount of \$1,968 for treatment allegedly related to Punlork Sar.

699. Encompass remitted payment by check via the U.S. Mail on July 16, 2001, in the amount of \$1,170 for treatment allegedly related to Punlork Sar.

700. Encompass remitted payment by check via the U.S. Mail on July 19, 2001, in the amount of \$450 for treatment allegedly related to Punlork Sar.

701. In addition, Encompass paid \$4,700 to Jorge Diaz in settlement of his alleged third-party tort claim, supported in significant part on the basis of fraudulent medicals Diaz allegedly incurred through First Spine.

77. Claimant(s): Saroeun Chan
DOL: 02/02/99

702. In connection with Encompass' claim no. 03382948, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

703. The patient is not listed on the police report as an occupant nor injured party.

704. According to defendants' records, Chan complained of pain 2 days after this accident in six separate areas. Pain grading 8 to 10 in severity, including 10 of 10 neck pain, 10 of 10 low back pain, 10 of 10 right leg pain and 10 of 10 chest pain.

705. The patient is referred for x-rays of the neck, mid-back and low back without any differential diagnosis. She never received the x-rays but treatment continues and there is no discontinuation of treatment. For this reason alone, treatment is unreasonable.

706. Chan received excessive treatment consisting of 44 chiropractic treatments over 140 days. There is about 2.25% improvement per visit, which is not consistent with the amount of time elapsed and treatment rendered.

707. There is no clinical basis warranting the regime of treatment allegedly provided to this patient. For example, she is treated with manipulation, electrical stimulation and hot packs for about 20 visits and then suddenly before her re-examination she is treated with manipulation and mechanical traction. The office note provides no

data regarding why the modality was changed. Subsequently, her treatment regime is switched back to thermal agent and electrical stimulation without any explanation and then back to mechanical traction again without explanation.

708. Accordingly, there is no nexus between the complaints and the treatments rendered and the notes certainly do not represent progressive improvement that would warrant continuation of treatment.

78. Claimant(s): Savonn Yonn
DOL: 10/19/02

709. In connection with Encompass' claim no. 03382948, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

710. The chiropractic records indicate no prior medical history, although Yonn was involved in or advanced claims for several prior accidents.

711. Yonn received 43 treatments, which is excessive, unreasonable and unnecessary.

79. Claimant(s): Nghlem Danh, Rosayadar Danh, Phirrun So and Jenifer Soneiga Hell
DOL: 09/04/04

712. In connection with Encompass' claim no. 03547961, defendants created and submitted false medical documentation in furtherance of a claim advanced under an automobile insurance policy with Encompass. See Exhibit 1.

713. First Spine patients, Nghlem Danh, Rosayadar Danh, Phirrun So and Jenifer Soneiga Hell reported that they (1) were billed for treatment not rendered; (2) received improper inducements to treat; and (3) received treatment unrelated to their reported injuries.

VIII. SPECIFIC ALLEGATIONS OF MAIL FRAUD RACKETEERING ACTIVITY

714. The defendants created, prepared and processed false medical documentation and intentionally violated the laws of the United States by, devising and intending to devise schemes to defraud and obtain money and property by means of false and fraudulent pretenses in representations, and by placing or causing to be placed, in a post office and/or authorized depository for mail matter, things to be sent and delivered by the United States Postal Service, in violation of 18 U.S.C. §1341 (mail fraud) for the purpose of executing such fraudulent schemes and attempting to do so.

715. Unless otherwise pled to the contrary, all documents, notes, reports, health insurance claim forms, medical diagnoses, CPT Code tally sheets, referrals, letters and request for payments in connection with the insurance claims referenced throughout this pleading traveled through the U.S. Mail.

716. In the case of documents generated in connection with Encompass claimants from the First Spine Lowell clinic, the medical records began as treatment (S.O.A.P.) notes that were mailed and/or faxed from the Lowell facility to Future Management headquarters in Chelmsford, Massachusetts. Thereafter, the corresponding medical invoice was generated.

717. Subsequently, the invoices wholly generated at Future Management headquarters were combined with medical narrative records and mailed from Future Management headquarters to (1) insurance companies (including Encompass) as well as, (2) patients' personal injury counsel.

718. Accordingly, the alleged treating chiropractors did not confirm the accuracy of the amounts billed in connection with treatment purportedly rendered and,

concomitantly, the amounts were not premised upon the actual level of service rendered but, instead, were preordained in every case including those cases for which Encompass seeks damages in this lawsuit.

719. Every automobile insurance claim detailed within, involved at least one use of the U.S. Mail, including the mailing of, among other things, the notice of claim, initial policies, insurance payments, claims settlement checks and the return of the cancelled settlement drafts to the financial institution(s) from which the draft(s) were drawn, as well as return of settlement draft duplicates to the insurance carrier's home office for filing.

720. Moreover, each claim identified herein, involved at least one mailing since policy documents are issued through the mail at the inception of the policy. In addition, negotiated checks are always returned to Encompass via the U.S. Mail.

721. The defendants either personally used the mails to further the fraudulent scheme by causing fraudulent medical bills and records to be mailed to Encompass and/or counsel for claimants and/or acted with knowledge that the use of the mails would follow in the ordinary course of business.

722. The defendants knew that their offices, a patient, a claimant, an insurance carrier, patient's attorney, other medical provider or the plaintiff would use the mails in connection with each of the fraudulent claims, including issuing payments based upon defendants' fraudulent documentation.

723. Encompass estimates that the defendants' fraudulent medical billing scheme generated hundreds of mailings. A table highlighting selected examples of mail fraud from the First Spine files is annexed hereto as Exhibit 2.

724. The defendants' fraudulent scheme went undetected until Encompass had sustained substantial financial injury. The nature of defendants' fraudulent scheme was self-concealing by its very nature -- false medical reports and false invoices appearing legitimate on their face.

725. The defendants intentionally concealed the fraudulent medical billing scheme from Encompass.

726. Upon defendants' first notice of Encompass' outside investigation (beginning approximately in May-June 2005), defendants instructed Future Management employees to execute confidentiality agreements regarding their knowledge of defendants' business activities, including the conduct alleged in this complaint.

IX. SPECIFIC ALLEGATIONS REGARDING GIAMPA CHIROPRACTORS AND KENNEDY BROTHERS CONTROL OF THE ENTERPRISES

727. The Giampa chiropractors and the Kennedy Brothers are the alter egos of First Spine, Kennedy Supply, Future Management, and the Giampa clinics (hereinafter collectively referred to as "Defendant Entities").

728. Through the Giampa chiropractors' and Kennedy Brothers' direction and control of the Defendant Entities, they substantively disregarded their corporate forms.

729. Since the Giampa chiropractors' and Kennedy Brothers' identity is indistinguishable from the Defendant Entities, they are subject to individual liability.

730. In every case in which First Spine patients were provided with unreasonable, unnecessary and excessive chiropractic treatment and/or when false medical documentation was created at First Spine, the Giampa chiropractors and Kennedy Brothers supervised and/or directed the chiropractors in connection with such treatments and tests.

731. At all material times, the employees of First Spine were under the direction and control of the Giampa chiropractors and Kennedy Brothers.

732. First Spine chiropractors were required by the Giampa chiropractors and Kennedy Brothers to follow a strict treatment protocol without deviation.

733. Accordingly, First Spine chiropractors, under the direction and control of the Giampa chiropractors and Kennedy Brothers, exercised no independent medical decision making with respect to treatment of automobile accident patients.

734. First Spine followed identical, pre-ordained assessments and therapy protocols and used virtually identical treatment and billing forms in connection with most every patient.

735. First Spine issued and sought payment for identical durable medical supply packages to auto accident claimants, regardless of need and/or the type, nature and severity of injury allegedly sustained.

736. By way of example, Encompass conducted a statement under oath of Phally Samith, an Encompass insured and current employee of First Spine, in connection with a November 23, 2003, automobile collision. Samith testified that:

- each First Spine patient receives an identical recipe of treatment regardless of the type, nature and extent of alleged injury;
- First Spine provides each patient with an identical package of durable medical goods (biofreeze, ice pack, and neck collar) regardless of the type, nature and extent of the injury; and
- Unlicensed employees of First Spine provided chiropractic therapies to First Spine patients/Encompass claimants.

737. The Giampa chiropractors and Kennedy Brothers controlled and directed all management and financial decisions of First Spine.

738. The defendants engaged in collection practices on behalf of First Spine knowing that the chiropractic services in connection with which collection was sought were in violation of 233 CMR 4.00-4.15, and that the alleged treatment rendered by chiropractors was either, or a combination of not warranted, not rendered, unreasonable, unnecessary and excessive, and, therefore, that the bills submitted for such services were unfair and deceptive.

739. The Giampa chiropractors and Kennedy Brothers are vicariously liable for the conduct of the Defendant Entities and the conduct of the employees and agents (including chiropractors and chiropractic aides) thereof.

740. Upon information and belief, First Spine is nominally capitalized.

741. Upon information and belief, corporate record keeping is insufficient with regard to intra and inter corporate records.

742. Upon information and belief, the Defendant Entities' intertwined financial transaction violates accepted corporate practices for corporations in good standing pursuant to Massachusetts law.

743. Upon information and belief, First Spine maintains inadequate record keeping regarding financial transactions between the Giampa clinics.

744. Upon information and belief, the Giampa chiropractors and Kennedy Brothers created First Spine not to heal injured persons but to pursue their insurance fraud schemes, which involved issuing to Encompass false, fraudulent and excessive medical bills to obtain money to which they were not entitled.

X. FRAUDULENT CONCEALMENT

745. The defendants acted with intent to conceal their misconduct with the medical billing fraud scheme from Encompass.

746. The defendants ability to conceal the fraudulent scheme was enhanced by the position of trust medical providers are typically accorded in the transaction of insurance medical claims.

747. Encompass relied to its detriment upon, among other things, the presumption of honesty accorded First Spine medical documentation.

748. Despite its due diligence, Encompass did not discover the medical billing fraud scheme until 2005.

749. Encompass' investigation is ongoing and new facts concerning defendants' scheme continue to be revealed.

XI. DAMAGES

750. The pattern of fraudulent conduct by the defendants injured Encompass in its business and property by reason of the aforesaid violations of state and federal law. Although it is not necessary for Encompass to calculate damages with specificity at this stage in the litigation, and Encompass' damages continue to accrue, Encompass' injury includes, but is not limited to, compensatory damages for:

- (1) the deprivation of Encompass' ability to conduct its insurance businesses on the basis of true, accurate, and complete assessments of legitimate, compensable claims;
- (2) the loss of funds paid for false and fraudulent (whether wholly fictitious or grossly inflated) bills for services, which funds, in part, enabled the

defendants to continue secretly its pattern of illegal activities and enhance its ability to harm further Encompass' business by and through the operation of the fraudulent enterprise;

- (3) settlement payments to claimants in third-party, bodily-injury claims and first-party, uninsured motorist claims (to the extent such payments were based upon defendants' fraudulent medical documentation and billing);
- (4) payments on judgments in third-party cases where plaintiff was obligated to pay bodily-injury tort awards (or uninsured motorist awards) that were artificially and falsely inflated (or based entirely upon) defendants' false medical documentation;
- (5) the expenses incurred to review, adjust, investigate, litigate and pay the false and fraudulent claims created by the defendants and supported defendants' operation of enterprises through a pattern of illegal activity;
- (6) the past and continuing financial burden incurred by Encompass (including other insurance carriers) to establish and carry out systems and policies to detect false, fraudulent, and inflated claims; and
- (7) payments in connection with first-party claims in excess of \$600,000.00, the exact amount to be determined at trial. The table annexed hereto as Exhibit 3 and incorporated herein identifies Encompass' payments to First Spine in connection with first party claims determined to be fraudulent as of the filing of this Complaint.

XII. CAUSES OF ACTION

COUNT I
VIOLATIONS OF 18 U.S.C. §1962(c)
(Against Frederick Giampa, Joseph Giampa,
Edward Kennedy, Brian Culliney and Jennifer McConnell)

751. Encompass realleges, repleads and incorporates by reference all paragraphs set forth above as if fully set forth herein.

752. In connection with each of the claims identified in plaintiff's Complaint, the Giampa chiropractors, and Kennedy Brothers, Brian Culliney and Jennifer McConnell (hereinafter "Count I Defendants") intentionally caused to be prepared and mailed false, fraudulent, and/or misleading documentation, false medical documentation in connection with Encompass insurance claims, in furtherance of their scheme to defraud.

753. The Count I Defendants employed one or more mailings to demand and/or receive payment on certain dates, including but not limited to, those dates referenced above.

754. Among other things, medical billing invoices, medical reports, applications for insurance and premium checks were routinely delivered to Encompass through the U.S. Mail. Policies of insurance were delivered to First Spine patients through the U.S. Mail. Medical reports and invoices were delivered to Encompass through the U.S. Mail. Payments to First Spine traveled via the U.S. Mail.

755. As documented above, Count I Defendants repeatedly and intentionally submitted false and inflated bills, reports, and other documents to Encompass for medical expenses and/or services that were never rendered, were excessive, were not reasonable, were not necessary, and/or were of little to no therapeutic value to the patients, to collect payment from Encompass under the personal injury protection benefits portion of the

Standard Massachusetts Automobile Policy of Insurance and Mass. Gen. Laws ch. §34A and §34M.

756. As a result of and in reasonable reliance upon these misleading documents and misrepresentations, Encompass by their agents and employees issued drafts to First Spine for the benefit of Count I Defendants that would not otherwise have been paid.

757. The Count I Defendants' pattern of fraudulent claims, each appearing legitimate on its face, also prevented Encompass from discovering the fraudulent scheme for a long period of time enabling them to continue without being detected.

758. The acts set forth above constitute indictable offenses pursuant to 18 U.S.C. §1341 (mail fraud).

759. By filing numerous fraudulent claims in an ongoing scheme, the Count I Defendants engaged in a pattern of racketeering activity within the meaning of 18 U.S.C. §1962(c).

760. The activities alleged in this case had the direct effect of causing funds to be transferred from Encompass to First Spine for the benefit of the Count I Defendants.

761. Encompass is in the business of writing insurance and paying claims in the Commonwealth. Insurance fraud schemes practiced here and elsewhere have a deleterious impact on Encompass' overall financial well-being and adversely affect insurance rates.

762. The defendants acting collectively constitute an association-in-fact enterprise, engaged in, and the activities of which affect interstate commerce.

763. Each of the Giampa clinics, including First Spine, constitutes enterprises engaged in, and the activities of which affect interstate commerce.

764. Future Management Corporation is an enterprise engaged in, and the activities of which effect interstate commerce.

765. The Count I Defendants associated with the foregoing enterprises and participated directly and indirectly in the conduct of each through a pattern of racketeering activities.

766. Encompass is a "person" as defined by 18 U.S.C. §1961(3), injured in its business or property by reason of the Count I Defendants' conduct.

767. The Count I Defendants' conduct in violation of 18 U.S.C. §1962(c) was the direct and proximate cause of Encompass' injury.

768. By virtue of the Count I Defendants' violations of 18 U.S.C. §1962(c), Encompass is entitled to recover from them three times the damages sustained by reason of the claims submitted by them, and others acting in concert with them, together with the costs of suit, including reasonable attorney's fees.

COUNT II
INNOCENT VICTIM ENTERPRISE VIOLATION OF 18 U.S.C. §1962(c)
(Against All Defendants)

769. Encompass realleges, repleads and incorporates by reference all paragraphs set forth above as if fully set forth herein.

770. Encompass is an enterprise engaged in, and the activities of which affect, interstate commerce.

771. The Count II Defendants associated with Encompass by directing the activities of First Spine and the employees thereof who purported to treat auto accident claimants, and thereafter, working in concert, submitted false and fraudulent bills to Encompass or others to whom Encompass became liable with the intent that Encompass

rely upon such false invoices and pay money to or for the benefit of the defendants pursuant to automobile insurance policies.

772. In violation of 18 U.S.C. §1962(c), the defendants by acting with purpose to cause Encompass to make payments on false claims victimized Encompass by participating in its affairs directly or indirectly through a pattern of racketeering activity, including on at least two or more occasions within a ten (10) year period, using the U.S. Mail to further their insurance fraud schemes.

773. Encompass has been injured in its business and property in violation of 18 U.S.C. §1962(c).

774. The defendants' conduct in violation of 18 U.S.C. §1962(c) was the direct and proximate cause of Encompass' injury.

775. By virtue of the defendants' violations of 18 U.S.C. §1962(c) Encompass is entitled to recover three times the damages sustained by reason of the claims submitted by the defendants, together with the costs of suit, including reasonable attorney's fees.

COUNT III
VIOLATION 18 U.S.C. § 1962 (d)
(Against All Defendants)

776. Encompass realleges, repleads and incorporates by reference all paragraphs set forth above as if fully set forth herein.

777. The Count III Defendants conspired with one another to violate 18 U.S.C. §1962 (c) and thereby violated 18 U.S.C. §1962 (d).

778. As a result of this conspiratorial conduct, Encompass sustained injury to its business and property.

779. By virtue of the Count III Defendants' violations of 18 U.S.C. § 1962 (d), Encompass is entitled to recover from each of the defendants identified, three times the damages sustained by reason of the claims submitted by the defendants, and others acting in concert with them, together with the costs of suit, including reasonable attorney's fees.

COUNT IV
Mass. Gen. Laws Ch. 93A
(Against All Defendants)

780. Encompass realleges, repleads and incorporates by reference all paragraphs set forth above as if fully set forth herein.

781. Section 2(a) of the Massachusetts Consumer Protection Act, Massachusetts General Laws Chapter 93A provides, that "unfair methods of competition and/or unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful."

782. At all times relevant hereto, the defendants were engaged in trade or commerce within the Commonwealth of Massachusetts.

783. The conduct alleged throughout this Complaint occurred primarily in Massachusetts.

784. As documented above, the defendants repeatedly and intentionally submitted false and inflated bills, reports, and other documents to Encompass for medical expenses and/or services that were never rendered, were excessive, were not reasonable, were not necessary, and/or were of little or no therapeutic value to the patients, to collect payment from Encompass under the personal injury protection benefits portion of the Standard Massachusetts Automobile Policy of Insurance and Mass. Gen. Laws ch. §34A and §34M.

785. The acts and omissions of the defendants in furtherance of their scheme to defraud Encompass including, but not limited to, the conduct alleged above, constitute intentionally unfair and deceptive business practices as proscribed by Mass. Gen. Laws ch. 93A, and those regulations promulgated by the Office of the Attorney General for the Commonwealth of Massachusetts pursuant thereto.

786. The defendants' intentionally unfair and deceptive acts and practices in trade or commerce caused Encompass to suffer great harm.

787. Whereas the defendants' illegal conduct forced Encompass to incur attorneys fees, such fees constitute a loss of money or property, and are recoverable pursuant to Mass. Gen. Laws ch. 93A.

788. As a result of the above-described intentionally fraudulent acts and practices, Encompass sustained injury and economic damages including, but not limited to: (1) all monies paid to First Spine, in reliance on false and fraudulent chiropractic bills; (2) cost of investigating the underlying PIP claims; and (3) the cost of defending this action (including all attorneys fees, expert witness expenses and court costs).

789. The defendants' actions described herein were performed intentionally. Accordingly, Encompass is entitled to multiple damages, costs and attorneys fees.

COUNT V
CIVIL CONSPIRACY
(Against All Defendants)

790. Encompass realleges, repleads and incorporates by reference all paragraphs set forth above as if fully set forth herein.

791. The defendants conspired to defraud Encompass, and agreed to combine together to accomplish an unethical, unfair, deceptive, wrongful and illegal purpose.

Joining the defendants were certain persons known (including treating chiropractors) and persons unknown to Encompass who, acting with the defendants, caused Encompass to pay for unnecessary and unreasonable medical expenses which the defendants would not have been able to accomplish acting alone.

792. As a consequence of the above-referenced conspiracy, Encompass was induced to and did make payments to First Spine, in connection with numerous fraudulent medical bills.

793. Encompass' damages include, but are not limited to:

- a. Monies paid for medical expenses and services that were not rendered;
- b. Monies paid for medical services and/or expenses that were unwarranted and/or excessive;
- c. Monies paid in settlement of claims based upon fraudulent special damages; and
- d. Monies paid (labor and resources) to detect and expose the defendants' conspiracy to defraud Encompass.

COUNT VI
FRAUD
(Against All Defendants)

794. Encompass realleges, pleads and incorporates by reference all paragraphs set forth above as if fully set forth herein.

795. The defendants' scheme to defraud Encompass was dependant upon a succession of material misrepresentations of fact by the defendants with respect to the injuries allegedly sustained by the patients, medical billing, medical services rendered, the reporting of losses and the evaluation of injuries.

796. The misrepresentations of fact by the defendants included, but were not limited to, the material misrepresentations of fact made in First Spine medical reports, invoices and collection documentation.

797. The defendants' representations were false, or required disclosure of additional facts to render the information furnished not misleading. The misrepresentations were intentionally made by the defendants in furtherance of their scheme to defraud Encompass by submitting fictitious claims for personal injury protection benefits, and bodily injury claims.

798. These misrepresentations were known to be false and were made for the purposes of inducing Encompass to make payments for claims that were not legitimate.

799. Encompass reasonably relied upon such material misrepresentations to its detriment in paying numerous, unreasonable, unnecessary, inappropriate, non-meritorious bills for medical expenses pursuant to personal injury protection benefits, bodily injury claims and uninsured/underinsured motorist claims.

800. Encompass' damages include, but are not limited to:

- a. Monies paid for medical expenses and services that were not rendered;
- b. Monies paid for medical services and/or expenses that were unwarranted and/or excessive;
- c. Monies paid in settlement of claims based upon fraudulent special damages; and
- d. Reimbursement for the fair and reasonable value of the labor and resources expended to detect and expose the defendants' scheme to defraud Encompass.

COUNT VII
**INTENTIONAL INTERFERENCE WITH ADVANTAGEOUS BUSINESS
AND CONTRACTUAL RELATIONSHIPS**
(Against All Defendants)

801. Encompass realleges, repleads and incorporates by reference all paragraphs set forth above as if fully set forth herein.

802. By engaging in the intentional insurance fraud scheme alleged throughout this pleading, the defendants, their agents, servants, employees and contractors unlawfully and intentionally interfered with the contractual and advantageous business relationships between Encompass and numerous insureds, policyholders, claimants and others.

XIII. DEMAND FOR RELIEF

WHEREFORE, the plaintiff, the Encompass Insurance Company respectfully prays that judgment enter in its favor, as follows:

COUNT I
(Violations Of 18 U.S.C. §1962(c))

- (a) AWARD Encompass' actual and consequential damages to be established at trial;
- (b) AWARD Encompass treble damages pursuant to 18 U.S.C. §1964, interests, costs and attorneys' fees; and
- (c) GRANT injunctive relief enjoining the defendants from engaging in the wrongful conduct alleged in the Complaint; and
- (d) GRANT all other relief this Court deems just.

COUNT II

(Innocent Victim Enterprise Violation Of 18 U.S.C. §1962(c))

- (a) AWARD Encompass' actual and consequential damages to be established at trial;
- (b) AWARD Encompass treble damages pursuant to 18 U.S.C. §1964, interests, costs and attorneys' fees; and
- (c) GRANT injunctive relief enjoining the defendants from engaging in the wrongful conduct alleged in the Complaint; and
- (d) GRANT all other relief this Court deems just.

COUNT III

(Violation 18 U.S.C. § 1962 (d))

- (a) AWARD Encompass' actual and consequential damages to be established at trial;
- (b) AWARD Encompass treble damages, interests, costs and reasonable attorneys' fees; and
- (c) GRANT injunctive relief enjoining the defendants from engaging in the wrongful conduct alleged in the Complaint; and
- (d) GRANT all other relief this Court deems just.

COUNT IV

(Mass. Gen. Laws ch. 93A)

- (a) ENJOIN defendants from preparing and submitting false and fraudulent medical records and bills;
- (b) ENJOIN defendants from altering, destroying and/or removing from this Court's jurisdiction any and all documents and materials including, but not limited to, medical records, medical invoices, appointment books, billing

documentation, corporate records, emails, and any other documentation (however stored) regarding the allegations and the claims alleged in connection with Encompass' Complaint.

- (c) ENJOIN defendants from conveying, secreting, transferring, selling, disposing of, encumbering, destroying, pledging, assigning or in any other manner dealing with any and all property, both real and personal, wherever located, in which the defendants have any interest without prior approval of this Court.
- (d) DIRECT defendants, their agents , assigns, successors-in-interest (including any bankruptcy trustees) to cease and desist all collection activity regarding Encompass;
- (e) AWARD Encompass its actual damages in an amount to be determined at trial;
- (f) AWARD Encompass its costs, including but not limited to, investigative costs incurred in the detection of defendants' illegal conduct;
- (g) AWARD Encompass its attorneys fees incurred in the prosecution of its Complaint;
- (h) TREBLE the award of damages to Encompass for the defendants' intentional violations of Mass. Gen. Laws ch. 93A;

COUNT V
(Civil Conspiracy)

- (a) AWARD Encompass its actual damages to be determined at trial;
- (b) GRANT any other relief this Court deems just.

COUNT VI

(Fraud)

- (a) AWARD Encompass its actual damages to be determined at trial;
- (b) GRANT any other relief this Court deems just.

COUNT VII

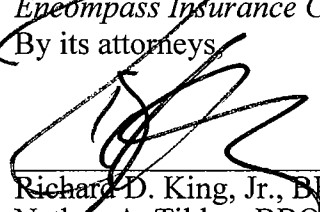
**(Intentional Interference with Advantageous Business
and Contractual Relationships)**

- (a) AWARD Encompass its actual damages to be determined at trial;
- (b) AWARD Encompass costs and fees and other expenses related to investigating and defending against the defendants' illegitimate and abusive use of process; and
- (c) GRANT any other relief this Court deems just.

JURY TRIAL DEMAND

Encompass demands trial by jury.

Respectfully submitted,
Encompass Insurance Company,
By its attorneys,


Richard D. King, Jr., BBO#638142
Nathan A. Tilden, BBO#647076
SMITH & BRINK, P.C.
122 Quincy Shore Drive
Quincy, Massachusetts 02171
(617) 770-2214

Dated: July 5, 2006

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03326411	Hang	Tran	01/09/98	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03326411	Nguyet	Nguyen	01/09/98	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03331518	Tut	Hok	09/11/98	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03341477	Phally	Lang	10/29/99	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03379614	Nikki	Kim	10/21/98	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03381790	Sokcheath	Park	12/14/98	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03381790	Sophalla	Chum	12/14/98	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03381790	Sophaly	Chum	12/14/98	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03391026	Uyen	Le	07/26/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03402742	Sacha	Tang	09/08/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03402742	Viphearea	Srey	09/08/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03402742	Wilson	Doungchack	09/08/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03408504	Kevin	Meas	02/23/01	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03408504	Samnang	Khut	02/23/01	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03413857	Dou	Narith	08/30/00	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03414660	Ouk	Ti	11/01/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03415264	Bin	Suon	11/18/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03415264	Ngeth	Soeung	11/18/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03415432	Sarath	Bou	11/25/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, or were not fully rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03415432	Sarunn	Vorn	11/25/00	X	X	X	X	X	X	X	X	X	X	X		X	X	
03415432	Sophal	Phan	11/25/00	X	X	X	X	X	X	X	X	X	X	X		X	X	
03415449	Roth	Khim	11/25/00	X	X	X	X	X	X	X	X	X	X	X		X	X	
03418795	Lysabad	Bo	02/11/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03418795	Punlor	Sar	02/11/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03418795	Samantha	Mao	02/11/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03418795	Sambar	Bo	02/11/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03418795	Sambath	Bo	02/11/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03418795	Sambun	Sar	02/11/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03420777	Oeun	Men	04/01/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03420777	Sart	Sok	04/01/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03420777	Khen	Khut	04/01/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03421674	April	Thanongsinh	01/08/99	X														
03425232	Emmy	Vann	04/25/99	X	X	X	X	X	X	X	X	X	X	X		X	X	
03425232	Naravuth	Mak	04/25/99	X	X	X	X	X	X	X	X	X	X	X		X	X	
03425232	Narayuth	Mak	04/25/99	X	X	X	X	X	X	X	X	X	X	X		X	X	
03425232	Sandy	Mak	04/25/99	X	X	X	X	X	X	X	X	X	X	X		X	X	
03440595	Sarin	Chhay	06/15/00	X	X	X	X	X	X	X	X	X	X	X		X	X	
03442397	Thanh	Som	02/17/01	X	X	X	X	X	X	X	X	X	X	X		X	X	

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, were not fully rendered, or were not rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03447628	Sammang	Ngeth	06/25/00	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03447628	Veasna	Ngeth	06/25/00	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03448910	Muth	Seng	08/14/01	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03448910	Sivnary	Seng	08/14/01	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03448910	Sunnak	Chiv	08/14/01									X						
03448910	Vandary	Seng	08/14/01	X	X	X	X	X	X	X	X	X	X	X		X	X	X
034566832	Dalin	Ou	09/08/01	X	X	X		X	X	X	X	X	X	X	X	X	X	X
034566832	Michael	Soum	09/08/01	X	X	X		X	X	X	X	X	X	X	X	X	X	X
03457313	Tim	Ouen	09/22/01	X	X	X	X		X	X	X	X	X	X		X	X	X
03457321	Sunnhak	Chiv	09/21/01	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03462436	Ry	Chhaim	02/13/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03462436	Sar	Chhean	02/13/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03464524	Jerry	Seng	04/23/02	X	X	X	X	X	X	X	X	X	X	X	X	X		X
03464524	Melody	Seng	04/23/02	X	X	X	X	X	X	X	X	X	X	X	X	X		X
03464524	Morn	Sok	04/23/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03465736	Chanda	Kong	06/04/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03465736	Chhang	Kang	06/04/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03465736	Phala	Phoun	06/04/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03469203	At	Ban	03/29/02	X	X	X	X	X	X	X	X	X	X	X		X		X

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, were not fully rendered, or were not rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03469203	Rick (Kimsat)	Ban	03/29/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03469371	Savan	Vat	04/04/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03470054	Manila	Panya	04/19/02					X					X	X				
03470133	Burkeath	Meng	04/19/02	X	X	X	X	X	X	X	X	X	X	X		X		
03470133	Rochenna	Sim	04/19/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03473966	Diane	Melo	07/15/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03474153	Phyrun	Chhim	07/18/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03475016	Song	Taing	08/03/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03479077	Khammoune	Panya	09/07/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03479077	Kongkeo	Phomphipak	09/07/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03480962	Chea	Theng	11/18/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03481235	Sally	Kong	11/27/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03481654	Mao	Ngeeth	12/13/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03481654	Nhoeun	Hem	12/13/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03481722	Sarom	Him	12/12/02			X							X	X				
03482803	Sareth	Veuk	01/21/03	X	X	X	X	X	X	X	X	X	X	X		X		X
03482803	Thaverei	Veuk	01/21/03	X	X	X	X	X	X	X	X	X	X	X		X		X
03483246	Phath	Sim	02/07/03	X	X	X	X	X	X	X	X	X	X	X		X		X
03483838	Brandon	Ouer	02/14/03	X	X	X	X	X	X	X	X	X	X	X		X		X

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, were not fully rendered, or were not rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03483838	Sokean	Phlong	02/14/03	X	X	X	X	X	X	X	X		X	X		X	X	
03485151	Ron	Phay	09/16/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03485151	Susie	Soeun	09/16/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03485991	Ly	Chan	10/02/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03485991	Pheakdey	Sok	10/02/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03486571	Lath	Uy	09/18/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03486571	Sovanna	Uy	09/18/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03486642	Den	Tith	10/16/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03486647	Vich	Lam	10/16/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03486795	Savonn	Yonn	10/19/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03487016	Diana	Phanthavong	10/23/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03487016	Rida	Chum	10/23/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03487193	Sakun	Sam	10/26/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03487193	Sophannee	Uy	10/26/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03490345	Rithy	Mao	12/26/02	X	X	X	X	X	X	X	X	X	X	X		X	X	
03491088	Sophannee	Uy	04/15/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03491823	John	Rom	05/23/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03493502	Diane	Melo	12/08/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03500338	Jimmy	Rom	03/24/03	X	X	X	X	X	X	X	X	X	X	X		X	X	

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, or were not fully rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03500338	John	Rom	03/24/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03500338	Kong	Liv	03/24/03	X	X		X	X	X	X	X	X	X	X		X	X	
03500623	Channak	Phai	03/28/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03504357	Channara	Dam	06/03/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03504357	Chantha	Sem	06/03/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03504357	Keath	Toch	06/03/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03504357	Sokkhouen	Sem	06/03/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03504357	Sokhon	Sem	06/03/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03504357	Sokha	Sem	06/03/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03504615	Kimsan	Mom	06/07/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03504615	Vanneck	Chea	06/07/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03505976	Keo	Kothpratum	06/28/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03505976	Vanta	Phanhanousinh	06/28/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03506013	Sokunthea	Eang	06/12/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03506712	John	Rom	07/11/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03506712	Liv	Kong	07/11/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03508820	Katherine	Mam	08/12/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03508820	Kimsat	Nuth	08/12/03	X	X	X	X	X	X	X	X	X	X	X		X	X	
03508820	Linda	Nuth	08/12/03	X	X	X	X	X	X	X	X	X	X	X		X	X	

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, or were not rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03510448	Kim	Sambath	07/26/03	X	X	X	X	X	X	X	X		X	X		X		X
03510448	Samnang	Sok	07/26/03	X	X	X	X	X	X	X	X		X	X		X		X
03510448	Sophannara	Eang	07/26/03	X	X	X	X	X	X	X	X		X	X		X		X
03511086	Morn	Samith	09/18/03	X	X	X	X	X	X	X	X		X	X		X		X
03511086	Thea	Soun	09/18/03	X	X	X	X	X	X	X	X		X	X		X		X
03513997	Kan	Peov	10/27/03	X	X	X	X	X	X	X	X		X	X		X		X
03513997	Kristina	Rath	10/27/03	X	X	X	X	X	X	X	X		X	X		X		X
03513997	Saleen	Phan	10/27/03	X	X	X	X	X	X	X	X		X	X		X		X
03513997	Vongdeane	Khiasoth	10/27/03	X	X	X	X	X	X	X	X		X	X		X		X
03513997	Charath	Rath	10/27/03	X	X	X	X	X	X	X	X		X	X		X		X
03530556	Ken	Truong	12/10/03	X	X	X	X	X	X	X	X		X	X		X		X
03532353	Pat	Song	01/03/04	X	X	X	X	X	X	X	X		X	X		X		X
03532767	Alma	Carrasquillo	01/10/04	X	X	X	X	X	X	X	X		X	X		X		X
03532767	Demetri	Molina	01/10/04	X	X	X	X	X	X	X	X		X	X		X		X
03532767	Robert	Delavalle	01/10/04	X	X	X	X	X	X	X	X		X	X		X		X
03533438	Michael	Inthabane	01/19/04	X	X	X		X	X	X	X		X	X		X		X
03536789	Savy	Vong	03/16/04	X	X	X	X	X	X	X	X		X	X		X		X
03540127	Sam	Sok	05/14/04	X	X	X	X	X	X	X	X		X	X		X		X
03374831	Sareoun	Sim	07/18/98	X	X	X	X	X	X	X	X		X	X		X		X

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, were not fully rendered, or were not rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03374831	Sareut	Roum	07/18/98	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03374831	Sardy	Un	07/18/98	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03374831	Sokea	Un	07/18/98	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
03382948	Sareoun	Chhan	02/02/99	X	X	X		X	X	X	X	X	X	X		X	X	X
03392271	Radet	Yem	08/29/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03403606	Margarita	Pina	10/06/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03411511	Sareth	Nuon	05/22/01	X	X	X	X	X	X	X	X	X	X	X	X		X	X
03414287	Doeun	Uy	10/25/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03414287	Knamsing	Khammanivong	10/25/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03415524	Eath	Keo	11/26/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03415524	Sophoeun	Kong	11/26/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03415760	Savy	Moun	11/26/00	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03417806	Hoemun	Men	01/20/01	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03417806	Nhem	Ngeth	01/20/01	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03418926	Nikki	Kim	02/13/01	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03419107	Cang	Keo	02/18/01	X	X	X	X	X	X	X	X	X	X	X	X		X	X
03419107	Khawail	Sok	02/18/01	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03419107	Kim	Neang	02/18/01	X	X	X	X	X	X	X	X	X	X	X		X	X	X
03419107	Sareth	Heang	02/18/01	X	X	X	X	X	X	X	X	X	X	X		X	X	X

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, or were not rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03420810	Bin	Real	04/02/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03420810	Nickie	Phan	04/02/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03425856	Oeun	Tim	05/16/99	X	X	X	X	X	X	X	X	X	X	X		X		X
03425856	Timmy	Tim	05/16/99	X	X	X	X	X	X	X	X	X	X	X		X		X
03432698	Peou	Ing	11/09/99	X	X	X	X	X	X	X	X	X	X	X	X	X		X
03436611	Lan	Lim	02/19/00	X	X	X	X	X	X	X	X	X	X	X		X		X
03438972	Angela	Mejia	01/14/00	X	X	X	X	X	X	X	X	X	X	X		X		X
03438972	Juan	Disla	01/14/00	X	X	X	X	X	X	X	X	X	X	X		X		X
03439611	Sokhan	Yang	05/19/00	X	X	X	X	X	X	X	X	X	X	X		X		X
03439668	Veun	Long	05/22/00	X	X	X	X	X	X	X	X	X	X	X		X		X
03444156	Anirut	Khuaphat	03/06/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03445147	Phamaro	Ulong	05/10/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03445147	Sophea	Um	05/10/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03445338	Phyrun	Chhim	05/16/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03445338	Ratha	So	05/16/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03445702	Michael	Pho	05/28/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03448741	Katie	Duong	08/06/01	X	X	X	X	X	X	X	X	X	X	X		X		X
03449560	Morn	Samith	10/05/02	X	X	X	X	X	X	X	X	X	X	X	X	X		X
03456762	Pamela	Nou	09/06/01	X	X	X	X	X	X	X	X	X	X	X		X		X

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, were not fully rendered, or were not rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03456762	Sarooun	Hou	09/06/01	X	X	X	X	X	X	X	X	X	X	X		X	X	
03459630	Hun	Hun	11/26/01			X												
03459630	Jim	Bun	11/26/01			X												
03459630	It	Toun	11/26/01			X												
03459630	Tuy	Pei	11/26/01			X												
03461410	Bunthy	Chantha	01/15/02	X	X	X		X	X	X	X	X	X	X		X		X
03461410	Sarath	Ros	01/15/02	X	X	X		X	X	X	X	X	X	X		X		X
03462771	Nheop	So	02/24/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03462771	Paulika	So	02/24/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03462771	Phaectra	So	02/24/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03462771	Savuth	Phan	02/24/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03462771	Cheatra	So	02/24/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03467194	Paul	Taylor	01/30/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03467477	Chitha	Ung	02/07/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03467477	Pholla	Long	02/07/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03467477	Samnang	San	02/07/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03467477	Sophinnay	Ung	02/07/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03467477	Volak	Neang	02/07/02	X	X	X	X	X	X	X	X	X	X	X		X		X
03468665	Samnang	Ngeth	03/15/02	X	X	X	X	X	X	X	X	X	X	X		X		X

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, were not fully rendered, or were not rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

Medical Record Evidence Supporting Allegations

CLAIM NO.	CLAIMANT FIRST NAME	CLAIMANT LAST NAME	DOL	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
03468665	Sitha	Mam	03/15/02	X	X	X	X	X	X	X	X	X	X	X	X	X		
03468665	Sitha	Ngeth	03/15/02	X	X	X	X	X	X	X	X	X	X	X	X	X		
03468725	Krapomroth	Khim	03/18/02	X	X	X	X	X	X	X	X	X	X	X	X	X		
03468725	Phoeun	Sam	03/18/02	X	X	X	X	X	X	X	X	X	X	X	X	X		
03468725	Sophay	Porth	03/18/02	X	X	X	X	X	X	X	X	X	X	X	X	X		
03469510	Sokhan	Bum	04/07/02	X	X	X	X	X	X	X	X	X	X	X	X	X		
03469757	Knou	Lay	04/15/02	X	X	X	X	X	X	X	X	X	X	X	X	X		

LEGEND:

- Creating and submitting inaccurate, inadequate and inappropriate documentation;
- Rendering treatment which exceeds the type, quality and/or amount of the documented and clinically reasonable chiropractic needs of the patient;
- Rendering a recipe of treatment absent any individualized medical decision making;
- Rendering treatment which is unrelated to the diagnosed, or reasonably suspected, injury or condition incurred by the patient;
- Rendering treatment which is provided solely for the purpose of enabling the patient to incur medical treatment expenses in excess of the tort threshold established by Mass. Gen. Laws ch. 231, §6D;
- Billing for services which were not performed and/or overstating the amount of time spent evaluating and/or treating patients;
- Billing that exceeds reasonable fees for such services in the clinic's geographic area;
- Submitting invoices containing charges that amount to overutilization of practice;
- Submitting invoices containing charges for examinations which are based on a level of coding which is not consistent with the patient's medical history, subjective and objective clinical findings concerning the patient which were made at the time of the visit, the complexity of the clinical decision-making involved in the diagnosis and/or treatment of the patient, or the nature of the care provided to the patient;
- Submitting invoices containing charges for treatments, procedures or services which were not rendered, were not fully rendered as represented by the charging chiropractor;
- Submitting treatment notes and invoices containing charges for excessive and improper use of supportive procedures and therapies;
- Submitting invoices and treatment records for treatment of minors that wholly exceed reasonable and necessary treatment parameters;
- Authoring false and misleading reports to insurance companies;
- Delay of 30 days or more in invoice submission to Encompass; and
- Exaggerated report of patient injury.

**Chart #2:
Mail Fraud Chart**

CLAIM NO.	PATIENT NAME	DATE	FROM	TO	CONTAINS
03468725	Phoeun Sam	07/23/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03468725	Krapomroth Khim	07/23/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03468725	Sophay Porth	07/23/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03421674	Aprii Thanongsinh	06/29/99	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03247628	Veasna Ngeeth and Sumnang Ngeeth	08/14/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03339668	Veun Long	11/28/00	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03415449	Krapomroth Khim	07/30/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03418926	Nikki Kim	08/07/01	Personal Injury Attorney	Encompass	Invoice
03245338	Ratha So	01/30/03	Collection Agency	Encompass	Invoice
03245338	Ratha So	09/17/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03279614	Bunreth Ngeeth	11/18/98	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03245702	Michael Pho	11/06/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03331518	Tut Hok	03/08/04	Collection Agency	Encompass	Medical Records and Invoices
03331518	Tut Hok	02/12/99	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03274831	Sokea Un	12/22/02	Collection Agency	CNA Insurance	Invoice
03414287	Cham Sing Kramsing	02/26/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03414287	Dooun Uy	02/26/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03439611	Sokhan Yang	11/30/00	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03415760	Savy Moun	05/17/04	Collection Agency	Encompass	Invoice
03415432	Sarunn Vorn	05/24/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03415432	Sopha Phan	10/20/04	First Spine	Encompass	Invoice
03415432	Sopha Phan	07/20/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03415432	Sarath Bou	06/26/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03417806	Hoeurn Men	03/25/04	Collection Agency	Encompass	Invoice
03417806	Nhem Ngeeth	11/21/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03420777	Khen Khout	11/08/04	Collection Agency	Encompass	Invoice
03420777	Khen Khout	07/31/01	Personal Injury Attorney	Encompass	Invoice
03382948	Sarooun Chhan	05/17/04	Collection Agency	Encompass	Invoice
03382948	Sarooun Chhan	10/01/99	Personal Injury Attorney	CNA Insurance	Invoice
03419107	Saneth Heang	03/14/03	First Spine	Encompass	Invoice
03419107	Saneth Heang	11/13/02	Collection Agency	Encompass	Invoice
03419107	Sareth Heang	09/05/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03419107	Cang Keo	08/28/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03419107	Kim Neang	08/28/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03419107	Khawail Sok	08/28/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03435147	Sopheaa Um	12/18/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03445147	Phammaro Ulong	10/19/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03403606	Margarita Pina	03/21/01	First Spine	Encompass	Invoice
03403606	Margarita Pina	03/20/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03414116	Marguera Sam	12/14/04	Collection Agency	Encompass	Invoice

Chart #2:
Mail Fraud Chart

CLAIM NO.	PATIENT NAME	DATE	FROM	TO	CONTAINS
03414116	Seek Sam	12/14/04	Collection Agency	Encompass	Invoice
03415524	Sophea Um	04/08/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03415524	Eath Keo	01/22/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03462436	Sar Chhean	11/12/02	Personal Injury Attorney	Encompass	Invoice
03462436	Sar Chhean	07/24/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03467477	Sophinary Ung	11/15/04	Collection Agency	Encompass	Invoice
03467477	Chitra Ung	02/18/04	Collection Agency	Encompass	Invoice
03467477	Pholla Long	11/18/02	Collection Agency	Encompass	Invoice
03467477	Samnang San	02/05/03	Collection Agency	Encompass	Invoice
03467477	Volak Neang	02/05/03	Collection Agency	Encompass	Invoice
03467477	Volak Neang	08/30/04	First Spire	Encompass	Invoice
03467477	Volak Neang	06/03/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03467477	Samnang San	06/28/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03442397	Thanh Som	12/24/01	Personal Injury Attorney	CNA Insurance	Invoice
03457321	Sunhak Chiv	04/02/03	Collection Agency	Encompass	Invoice
03420810	Bin Real	09/09/01	Personal Injury Attorney	Encompass	Medical Records
03420810	Nickie Phan	08/16/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03480962	Chea Taing Theng	05/01/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03462436	Ry Chhaim	05/09/02	Personal Injury Attorney	Encompass	Invoice
03462436	Tim Neang	07/08/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
0349223	Boeuk Pin	09/30/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03493502	Diane Melo	10/12/04	Personal Injury Attorney	Encompass	Invoice
03469510	Sokhan Burn	02/10/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03444156	Jaernwimon Phramahaphon	08/15/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03444156	Anirut Khuaphat	08/08/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03438972	Naim Eng	06/27/01	Personal Injury Attorney	CNA Insurance	Invoice
03438972	Santa Dones	06/29/01	Personal Injury Attorney	CNA Insurance	Invoice
03428972	Carmen Perez	06/27/01	Personal Injury Attorney	CNA Insurance	Invoice
03438972	Juan Disla	12/09/03	Personal Injury Attorney	CNA Insurance	Invoice
03326411	Nguyet Nguyen Hang Tran	05/26/98	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03402742	Viphearea Srey	08/02/01	Personal Injury Attorney	CNA Insurance	Invoice
03402742	Sacha Tang	05/29/01	Personal Injury Attorney	CNA Insurance	Invoice
03402742	Wilson Douongchack	08/29/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03417018	Kamsot Kong	05/24/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03415264	Ngeth Soeung	10/14/04	Collection Agency	Encompass	Invoice
03415264	Bin Soun	12/02/02	Collection Agency	Encompass	Invoice
03381790	Sokcheath Park	05/12/00	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03381790	Sophaly Chum	05/10/00	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03381790	Sophaly Chum	05/10/00	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03381790	Kosal Nguon	05/18/99	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices

Chart #2:
Mail Fraud Chart

CLAIM NO.	PATIENT NAME	DATE	FROM	TO	CONTAINS
03514331	Chhat Phim	10/20/04	First Spine	Encompass	Invoice
03479077	Kongkeo Phonphiak	12/04/02	Collection Agency	Encompass	Invoice
03479077	Khammoune Panya	11/15/02	Collection Agency	Encompass	Invoice
03465736	Chhang Kang	12/16/02	Collection Agency	Encompass	Invoice
03465736	Chanda Kong	12/30/02	Collection Agency	Encompass	Invoice
03464181	Prasan Phumbchan	05/01/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03456762	Pamela Nou	12/18/02	Collection Agency	Encompass	Invoice
03456762	Sarooun Hou	12/31/02	Collection Agency	Encompass	Invoice
03456762	Pamela Nou and Sarouen Hou	01/22/02	Personal Injury Attorney	Encompass	Invoice
03408504	Samnang Khut	04/29/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03408504	Samnang Khut	12/16/02	Collection Agency	Encompass	Invoice
03408504	Kevin Meas	10/24/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03491823	John Rom	03/09/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03457313	Oeun Tim	01/08/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03406712	Liv Kong	11/04/04	First Spine	Encompass	Invoice
03406712	John Rom	01/22/04	First Spine	Encompass	Invoice
03486795	Savonn Yonn	03/25/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03486795	Savonn Yonn	01/06/03	Collection Agency	Encompass	Invoice
03500338	John Rom	10/16/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03500338	Kong Liv	08/27/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03500338	Jimmy Rom	02/04/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03530556	Ken Truong	04/14/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03532353	Pat Song	02/25/05	Collection Agency	Encompass	Invoice
03532353	Pat Song	06/16/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03505976	Keo Kohpraboum	06/01/04	First Spine	Encompass	Invoice
03511086	Thea Soum	07/20/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03511086	Morn Samnith	04/29/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03506013	Chaly Sibunroeng	12/18/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03440595	Sarin Chhay	10/06/00	Personal Injury Attorney	CNA Insurance	Invoice
034069757	Data Lay	08/28/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03504357	Reath Toch	03/31/04	First Spine	Encompass	Invoice
03448910	Sivnary Seng	10/14/04	Collection Agency	Encompass	Invoice
03504615	Alexander Men	11/04/04	First Spine	Encompass	Invoice
03504615	Vanneck Chea	11/03/04	First Spine	Encompass	Invoice
03504615	Alexander Men	02/18/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03504615	Kimsan Morn	01/26/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03425856	Tim Oeun and Timmy Tim	12/17/99	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03413857	Narith Dou	04/10/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03491088	Sopannee Uy	11/12/03	Personal Injury Attorney	CNA Insurance	Invoice
03449560	Morn Samnith	05/28/03	Personal Injury Attorney	Encompass	Medical Records and Invoices

**Chart #2:
Mail Fraud Chart**

CLAIM NO.	PATIENT NAME	DATE	FROM	TO	CONTAINS
03490345	Ritty Mao	03/06/03	Personal Injury Attorney	Encompass	Invoice
03445658	Tab Lay	10/02/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03445658	Pheap Tim	10/09/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03418795	Punlork Sar	10/14/04	Collection Agency	Encompass	Invoice
032918795	Samatha Mao	05/24/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03418795	Sambath Bo	06/28/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03418795	Jorge Diaz	09/21/01	Personal Injury Attorney	Encompass	Medical Records and Invoices
03464524	Phoeuk Neang	08/23/02	Personal Injury Attorney	Encompass	Medical Records
03464524	Jerry Seng	08/16/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03464524	Mealy Seng	08/16/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03470133	Rochenna Sim	10/07/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03470133	Bunkeath Meng	09/23/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03436611	Lan Lim	09/27/00	Personal Injury Attorney	CNA Insurance	Medical Records
03456832	Dalin Ou	10/20/04	First Spine	Encompass	Invoice
03456832	Dalin Ou	05/29/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03456832	Dalin Ou	12/22/02	Collection Agency	Encompass	Invoice
03391026	Phuong Uyen Le	02/26/01	Personal Injury Attorney	CNA Insurance	Medical Records and Invoices
03483838	Sokean Phlong	01/23/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03483838	Brandon Oeur	04/14/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03473966	Diane Mele	09/26/02	Personal Injury Attorney	Encompass	Invoice
03482803	Sareth Veuk	07/17/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03482803	Thaverei Veuk	07/17/03	Personal Injury Attorney	Encompass	Medical Records and Invoices
03536789	Savy Vong	09/24/04	Personal Injury Attorney	Encompass	Medical Records and Invoices
03467194	Marion Garcia	10/28/02	Collection Agency	Encompass	Invoice
03467194	Paul Taylor	12/03/02	Collection Agency	Encompass	Invoice
03486647	Vich Lam	03/08/05	Collection Agency	Encompass	Invoice
03461410	Sarah Ros	01/03/05	Collection Agency	Encompass	Invoice
03461410	Bunthy Chanthra	11/22/02	Personal Injury Attorney	Encompass	Invoice
03481235	Chinda Kruth	10/19/04	First Spine	Encompass	Invoice
03211511	Sareth Nhon	07/21/04	Collection Agency	Encompass	Invoice
03211511	Sareth Nhon and Roeun Kong	05/03/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03469203	Kim Sat (Rick) Ban	12/11/02	Collection Agency	Encompass	Invoice
03469203	At Ban	12/11/02	Collection Agency	Encompass	Invoice
03469203	At Ban	08/14/03	Collection Agency	Encompass	Invoice
03469203	Kim Sat (Rick) Ban	08/21/03	Collection Agency	Encompass	Invoice
03469203	At Ban	11/21/02	Collection Agency	Encompass	Invoice
03469203	Kim Sa (Rick) Ban	11/12/02	Personal Injury Attorney	Encompass	Medical Records and Invoices
03469203	Kim Sat (Rick) Ban	04/07/03	Encompass	Personal Injury Attorney	Records Review
03469203	Kim Sat (Rick) Ban	10/10/02	Encompass	Personal Injury Attorney	Records Review
03469203	Kim Sat (Rick) Ban	03/07/03	Personal Injury Attorney	Encompass	Request for Payment

Chart #2:
Mail Fraud Chart

CLAIM NO.	PATIENT NAME	DATE	FROM	TO	CONTAINS
03469203	At Ban	05/29/03	Personal Injury Attorney	Encompass	Lost Wage Check
03469203	At Ban		Personal Injury Attorney	Encompass	PIP Checks
03469203	Kim Sat (Rick) Ban	07/24/02	Personal Injury Attorney	Encompass	Records Review
03469203	Kim Sat (Rick) Ban	10/10/02	Encompass	Personal Injury Attorney	PIP Application
03469203	Kim Sat (Rick) Ban	09/25/02	Personal Injury Attorney	Encompass	PIP Application
03469203	Kim Sat (Rick) Ban	11/04/02	Collection Agency	Encompass	Invoice for PIP Payments
03469203	Kim Sat (Rick) Ban	09/26/02	ERI Expert Review Incorporated	Encompass	Independent Medical Review
03469203	Kim Sat (Rick) Ban	09/30/02	ERI Expert Review Incorporated	Encompass	Invoice
03469203	Kim Sat (Rick) Ban	10/07/02	Personal Injury Attorney	Encompass	PIP Application
03469203	At Ban	09/05/02	Personal Injury Attorney	Encompass	Invoices
03469203	At Ban	10/10/02	Encompass	Personal Injury Attorney	Medical Records Review
03469203	At Ban	11/04/02	Collection Agency	Encompass	Invoice
03469203	At Ban	09/26/02	ERI Expert Review Incorporated	Encompass	Medical Records Review
03469203	At Ban	09/30/02	ERI Expert Review Incorporated	Encompass	Invoice
03469203	Cynthia Laing	11/14/01	Encompass	Personal Injury Attorney	Request for Payment
0341477	Phally Lang	01/09/02	First Spine and Rehab.	Encompass	Request for Medical Records
03448741	Katie Duong	12/31/01	First Spine and Rehab.	Encompass	Medical Records
03432698	Pecu Ing	02/08/00	Medical Records Associates	CNA personal Insurance	Medical Records
03475016	Seng Eam Taing	12/19/02	Personal Injury Attorney	Encompass	Medical Records

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03326411	01/09/98	\$975.00	06/26/98	Tran	Hang	Culliney
03326411	01/09/98	\$970.00	06/26/98	Nguyen	Nguyet	Culliney
03374831	07/18/98	\$2,900.00	04/09/88	Roum	Saroeut	Culliney
03374831	07/18/98	\$1,377.00	04/02/99	Un	Sendy	Culliney
03374831	07/18/98	\$2,822.00	04/02/99	Un	Sokea	Culliney
03374831	07/18/98	\$1,375.00	04/02/99	Sim	Saroeut	Culliney
03374831	07/18/98	\$665.00	04/14/99	Un	Sokea	Culliney
03374831	07/18/98	\$1,907.00	04/14/99	Sim	Saroeut	Culliney
03374831	07/18/98	\$150.00	04/14/99	Sim	Saroeut	Culliney
03374831	07/18/98	\$177.00	07/31/02	Roum	Saroeut	Culliney
03331518	09/10/98	\$129.00	03/16/99	Hok	Tut	Culliney
03331518	09/10/98	\$3,896.00	12/08/04	Hok	Tut	Culliney
03379614	10/21/98	\$655.00	02/12/99	Nikki	Kim	Culliney
03379614	10/21/98	\$465.00	02/24/99	Nikki	Kim	Culliney
03381790	12/14/98	\$1,579.00	03/30/99	Chum	Sophala	Culliney
03381790	12/14/98	\$2,212.00	03/30/99	Prak	Sokcheath	Culliney
03381790	12/14/98	\$1,847.00	03/30/99	Chum	Sophala	Culliney
03381790	12/14/98	\$1,833.00	02/17/00	Prak	Sokcheath	Culliney
03381790	12/14/98	\$2,236.00	11/27/01	Chum	Sophala	Culliney
03381790	12/14/98	\$1,558.00	11/27/01	Chum	Sophala	Culliney
03421674	01/08/99	\$226.00	04/28/99	Thanongsinh	April	Culliney
03382948	02/02/99	\$2,000.00	09/24/99	Chuu	Saroen	Culliney
03382948	02/02/99	\$1,625.00	01/12/00	Chuu	Saroen	Culliney
03382948	02/02/99	\$1,625.00	11/12/00	Chhu	Saroeun	Culliney
03382948	02/02/99	\$1,625.00	06/08/04	Chhu	Saroeun	Culliney
03425232	04/25/99	\$150.00	02/16/00	Mak	Naravuth	Culliney
03425232	04/25/99	\$150.00	02/16/00	Mak	Sandy	Culliney
03425232	04/25/99	\$150.00	02/16/00	Vann	Emmy	Culliney
03425232	04/25/99	\$150.00	02/16/00	Mak	Naravuth	Culliney
03425232	04/25/99	\$2,763.00	06/26/00	Mak	Naravuth	Culliney
03425232	04/25/99	\$3,023.00	06/26/00	Vann	Emmy	Culliney
03425232	04/25/99	\$1,866.00	06/26/00	Mak	Sandy	Culliney
03425232	04/25/99	\$3,073.00	06/26/00	Naraguth	Norayuti	Culliney
03425856	05/16/99	\$2,000.00	06/20/00	Tim	Oeun	Culliney
03425856	05/16/99	\$2,000.00	10/11/00	Tim	Timmy	Culliney
03425856	05/16/99	\$1,199.00	02/02/01	Tim	Oeun	Culliney
03341477	10/29/99	\$1,068.00	03/21/00	Lang	Phally	Culliney
03341477	10/29/99	\$1,867.00	04/23/01	Lang	Phally	Culliney
03341477	10/29/99	\$695.00	03/20/02	Lang	Phally	Culliney
03432698	11/09/99	\$2,235.00	03/17/00	Ing	Peou	Culliney
03432698	11/09/99	\$960.00	07/03/00	Ing	Peou	Culliney
03438972	01/14/00	\$3,817.00	01/20/03	Mejia	Angela	Unknown
03438972	01/14/00	\$4,032.00	12/19/03	Disla	Juan	Unknown
03436611	02/20/00	\$2,000.00	05/04/00	Lim	Lan	Culliney
03436611	02/20/00	\$2,270.00	01/04/01	Lim	Lan	Culliney
03396719	03/12/00	\$2,000.00	05/02/00	Laing	Cynthia	Unknown
03439611	05/19/00	\$1,387.00	01/19/01	Yang	Sokhan	Culliney
03439611	05/19/00	\$2,875.00	06/06/02	Yang	Sokhan	Culliney
03439668	05/22/00	\$2,495.00	08/22/00	Long	Veun	Culliney
03439668	05/22/00	\$80.00	08/22/00	Long	Veun	Culliney
03439668	05/22/00	\$1,610.00	01/17/01	Long	Veun	Culliney
03439668	05/22/00	\$75.00	03/13/01	Long	Veun	Culliney
03440595	06/15/00	\$95.00	09/15/00	Chhay	Sarin	Culliney
03440595	06/15/00	\$2,350.00	10/09/00	Chhay	Sarin	Culliney

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03440595	06/15/00	\$970.00	10/26/00	Chhay	Sarin	Culliney
03440595	06/15/00	\$420.00	11/07/00	Chhay	Sarin	Culliney
03440595	06/15/00	\$505.00	01/04/01	Chhay	Sarin	Culliney
03447628	06/25/00	\$4,101.00	11/12/01	Ngeth	Veasha	Culliney
03447628	06/25/00	\$4,256.00	11/12/01	Ngeth	Samnang	Culliney
03391026	07/26/00	\$3,910.00	04/07/01	Phoung	Le	McConnell
03391026	07/26/00	\$110.00	06/21/01	Phoung	Le	McConnell
03391026	07/26/00	\$110.00	06/21/01	Phoung	Le	McConnell
03391026	07/26/00	\$110.00	02/19/02	Phoung	Le	McConnell
03391026	07/26/00	\$110.00	02/19/02	Phoung	Le	McConnell
03392271	08/29/00	\$1,775.00	06/04/01	Yem	Radet	Culliney
03413857	08/30/00	\$4,505.00	04/11/01	Narith	Dou	Culliney
03402742	09/08/00	\$3,030.00	02/28/01	Spey	Viphearea	Culliney
03402742	09/08/00	\$190.00	05/11/01	Tang	Sacha	Culliney
03402742	09/08/00	\$950.00	05/11/01	Spey	Viphearea	Culliney
03402742	09/08/00	\$1,130.00	08/02/01	Tang	Sacha	Culliney
03402742	09/08/00	\$555.00	09/21/01	Duongchack	Wilson	Culliney
03402742	09/08/00	\$1,585.00	09/24/01	Duongchack	Wilson	Culliney
03402742	09/08/00	\$415.00	09/26/01	Duongchack	Wilson	Culliney
03402742	09/08/00	\$415.00	09/26/01	Duongchack	Wilson	Culliney
03402742	09/08/00	\$2,810.00	02/19/02	Tang	Sacha	Culliney
03403606	10/06/00	\$150.00	05/24/01	Pina	Margarita	Winn
03414287	10/25/00	\$1,816.00	02/28/01	Khannanivongh	Khamsing	Culliney/McConnell
03414287	10/25/00	\$1,763.00	04/11/01	Uy	Doeun	Culliney/McConnell
03414660	11/01/00	\$3,885.00	09/27/01	TI	Ouk	McConell
03415264	11/18/00	\$2,000.00	04/10/01	Suon	Bin	McConell
03415264	11/18/00	\$2,000.00	07/16/01	Soeng	Ngeth	McConell
03415432	11/25/00	\$2,108.00	05/30/01	Bou	Sarath	Culliney
03415432	11/25/00	\$1,993.00	05/30/01	Vorn	Saron	Culliney
03415432	11/25/00	\$1,963.00	05/30/01	Vorn	Saron	Culliney
03415432	11/25/00	\$2,493.00	05/30/01	Phan	Sophal	McConell
03415432	11/25/00	\$1,760.00	07/16/01	Bou	Sarath	Culliney
03415449	11/25/00	\$3,508.00	09/25/01	Khim	Rumchek	Culliney
03415432	11/25/00	\$740.00	02/24/03	Phan	Sophal	McConell
03415432	11/25/00	\$330.00	03/11/04	Vorn	Saron	Culliney
03415432	11/25/00	\$300.00	12/16/04	Phan	Sophal	McConell
03415524	11/26/00	\$1,218.00	04/16/01	Kong	Sopeun	Culliney
03415760	11/26/00	\$2,028.00	05/15/01	Moun	Savy	McConell
03415524	11/26/00	\$1,395.00	09/25/01	Keo	Eath	McConell
03415524	11/26/00	\$2,805.00	02/04/02	Keo	Eath	McConell
03415760	11/26/00	\$1,765.00	12/09/02	Moun	Savy	McConell
03417806	01/20/01	\$2,420.00	05/07/01	Men	Hoeurn	McConell
03417806	01/20/01	\$1,455.00	07/20/01	Ngeth	Nhben	McConell
03418795	02/11/01	\$1,818.00	06/15/01	Bo.	Lysabad	Culliney
03418795	02/11/01	\$1,973.00	06/15/01	Sar	Sambun	Culliney
03418795	02/11/01	\$2,053.00	06/15/01	Mao	Samentha	McConell
03418795	02/11/01	\$1,878.00	06/15/01	Bo	Samban	McConell
03418795	02/11/01	\$1,958.00	06/15/01	Bo	Sambath	McConell
03418795	02/11/01	\$1,968.00	06/15/01	Sar	Punlork	Culliney
03418795	02/11/01	\$1,150.00	06/19/01	Mao	Samentha	McConell
03418795	02/11/01	\$2,220.00	06/19/01	Bo	Samban	McConell
03418795	02/11/01	\$1,400.00	06/21/01	Bo	Sambath	McConell
03418795	02/11/01	\$1,795.00	06/21/01	Bo.	Lysabad	Culliney
03418795	02/11/01	\$2,105.00	07/16/01	Sar	Sambun	Culliney

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03418795	02/11/01	\$1,170.00	07/16/01	Sar	Punlork	Culliney
03418795	02/11/01	\$450.00	07/19/01	Sar	Punlork	Culliney
03418926	02/13/01	\$2,000.00	08/02/01	Kim	Nikki	Culliney
03442397	02/17/01	\$2,000.00	06/25/01	Som	Thanh	Culliney
03442397	02/17/01	\$1,880.00	02/11/02	Som	Thanh	Culliney
03442397	02/17/01	\$394.00	06/12/02	Som	Thanh	Culliney
03419107	02/18/01	\$1,631.00	07/02/01	Sarath	Heano	Culliney
03419107	02/18/01	\$444.00	07/23/01	Sarath	Heano	Culliney
03419107	02/18/01	\$4,250.00	08/06/01	Sok	Khawaii	McConell
03419107	02/18/01	\$2,895.00	08/06/01	Neang	Kim	McConell
03419107	02/18/01	\$3,765.00	08/06/01	Cang	Keo	McConell
03419107	02/18/01	\$330.00	04/11/02	Sok	Khawaii	McConell
03419107	02/18/01	\$1,615.00	04/11/02	Sarath	Heano	Culliney
03419107	02/18/01	\$600.00	07/02/02	Neang	Kim	McConell
03419107	02/18/01	\$270.00	07/17/02	Neang	Kim	McConell
03419107	02/18/01	\$90.00	07/25/03	Sarath	Heano	Culliney
03408504	02/23/01	\$3,505.00	07/23/02	Meas	Kevin	McConell
03408504	02/23/01	\$2,905.00	09/16/02	Khut	Samnang	Culliney
03444156	03/06/01	\$4,100.00	11/28/01	Khuanphet	Anirut	McConell
03420777	04/01/01	\$2,000.00	06/26/01	Men	Oeun	Culliney
03420777	04/01/01	\$2,035.00	07/03/01	Sok	Sart	Culliney
03420777	04/01/01	\$810.00	07/23/01	Sok	Sart	Culliney
03420777	04/01/01	\$2,313.00	08/03/01	Khent	Khen	Culliney
03420777	04/01/01	\$695.00	08/13/01	Khent	Khen	Culliney
03420777	04/01/01	\$1,115.00	08/21/01	Men	Oeun	Culliney
03420777	04/01/01	\$1,010.00	08/21/01	Khent	Khen	Culliney
03420777	04/01/01	\$1,115.00	08/21/01	Sok	Sart	Culliney
03420777	04/01/01	\$200.00	05/24/04	Men	Oeun	Culliney
03420777	04/01/01	\$695.00	05/24/04	Khent	Khen	Culliney
03420810	04/02/01	\$1,928.00	07/31/01	Real	Bin	McConell
03420810	04/02/01	\$132.00	07/31/01	Real	Bin	McConell
03420810	04/02/01	\$1,943.00	08/16/01	Phan	Nickie	McConell
03420810	04/02/01	\$205.00	10/24/01	Phan	Nickie	McConell
03420810	04/02/01	\$1,920.00	01/30/02	Real	Bin	McConell
03445147	05/10/01	\$1,652.00	11/12/01	Uong	Phamaro	Culliney
03445147	05/10/01	\$1,870.00	12/17/01	Um	Sopheha	McConell
03445147	05/10/01	\$2,497.00	03/20/02	Uong	Phamaro	Culliney
03445147	05/10/01	\$2,249.00	04/08/02	Um	Sopheha	McConell
03445338	05/16/01	\$4,547.00	08/21/02	Chhim	Phyrum	Culliney
03445338	05/16/01	\$4,582.00	09/20/02	So	Ratha	Culliney
03445702	05/28/01	\$270.00	12/11/01	Pho	Michael	Culliney
03445702	05/28/01	\$3,614.00	12/11/01	Pho	Michael	Culliney
03448741	08/06/01	\$2,099.00	10/23/01	Doung	Katie	Culliney
03448741	08/06/01	\$605.00	11/16/01	Doung	Katie	Culliney
03448741	08/06/01	\$180.00	03/29/02	Doung	Katie	Culliney
03448741	08/06/01	\$257.00	04/03/02	Doung	Katie	Culliney
03448910	08/14/01	\$2,119.00	10/19/01	Seng	Muth	Culliney
03448910	08/14/01	\$1,854.00	10/19/01	Chiv	Sunnak	Culliney
03448910	08/14/01	\$2,015.00	10/19/01	Seng	Sivinary	Culliney
03448910	08/14/01	\$1,341.00	03/04/02	Seng	Sivinary	Culliney
03448910	08/14/01	\$540.00	03/04/02	Seng	Muth	Culliney
03448910	08/14/01	\$951.00	03/04/02	Seng	Muth	Culliney
03448910	08/14/01	\$175.00	03/04/02	Chiv	Sunnak	Culliney
03448910	08/14/01	\$434.00	04/12/02	Seng	Sivinary	Culliney

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03448910	08/14/01	\$1,699.00	04/12/02	Seng	Muth	Culliney
03448910	08/14/01	\$2,489.00	05/21/02	Seng	Vandary	Culliney
03448910	08/14/01	\$317.00	01/05/04	Seng	Sivinary	Culliney
03456762	09/06/01	\$2,789.00	01/30/02	Hou	Saroeun	McConell
03456762	09/06/01	\$1,614.00	01/30/02	Nou	Pamela	McConell
03456762	09/06/01	\$973.00	03/07/02	Hou	Saroeun	McConell
03456832	09/08/01	\$105.00	02/28/02	Soum	Mike	McConell
03456832	09/08/01	\$2,590.00	03/06/02	Soum	Mike	McConell
03456832	09/08/01	\$2,433.00	04/01/02	Ou	Dalin	Culliney
03456832	09/08/01	\$1,717.00	04/12/02	Ou	Dalin	Culliney
03456832	09/08/01	\$1,947.00	04/12/02	Soum	Mike	McConell
03456832	09/08/01	\$180.00	08/09/02	Ou	Dalin	Culliney
03457321	09/21/01	\$1,995.00	11/07/02	Chiv	Suntak	McConell
03457313	09/22/01	\$472.00	09/12/02	Oeun	Tim	Culliney
03457313	09/22/01	\$1,315.00	02/25/03	Oeum	Tim	Culliney
03459630	11/26/01	\$1,465.00	04/15/02	It	Toun	Culliney
03459630	11/26/01	\$1,475.00	04/18/02	Hum	Hun	Culliney
03459630	11/26/01	\$2,261.00	04/18/02	Pei	Tuy	Culliney
03459630	11/26/01	\$77.00	05/14/02	It	Toun	Culliney
03459630	11/26/01	\$1,038.00	12/02/02	It	Toun	Culliney
03459630	11/26/01	\$640.00	12/02/02	It	Toun	Culliney
03459630	11/26/01	\$1,656.00	01/23/03	It	Toun	Culliney
03459630	11/26/01	\$1,465.00	01/23/03	It	Toun	Culliney
03459630	11/26/01	\$1,465.00	01/29/03	It	Toun	Culliney
03459630	11/26/01	\$115.00	07/26/03	Pei	Tuy	Culliney
03459630	11/26/01	\$1,893.00	10/09/03	Hum	Hun	Culliney
03459630	11/26/01	\$1,693.00	10/10/03	Bun	Jim	Culliney
03459630	11/26/01	\$1,970.00	10/10/03	Pei	Tuy	Culliney
03461410	01/15/02	\$2,000.00	04/08/02	Ros	Sarath	Culliney
03461410	01/15/02	\$2,000.00	04/08/02	Chantha	Bunthy	McConell
03461410	01/15/02	\$550.00	01/06/03	Chantha	Bun	McConell
03461410	01/15/02	\$1,133.00	07/21/04	Chantha	Bun	McConell
03461410	01/15/02	\$365.00	10/13/04	Chantha	Bun	McConell
03461410	01/15/02	\$486.00	10/28/04	Chantha	Bun	McConell
03461410	01/15/02	\$693.00	11/11/04	Chantha	Bun	McConell
03467194	01/30/02	\$1,040.00	03/21/02	Taylor	Paul	Culliney
03467194	01/30/02	\$1,178.00	05/13/02	Taylor	Paul	McConell
03467477	02/07/02	\$1,450.00	09/06/02	Ung	Chithra	Culliney
03467477	02/07/02	\$1,475.00	09/06/02	Long	Pholla	Culliney
03467477	02/07/02	\$1,560.00	09/06/02	Ung	Volak	Culliney
03467477	02/07/02	\$1,025.00	09/06/02	Ung	Sophinna	McConell
03467477	02/07/02	\$1,640.00	09/06/02	San	Samnang	McConell
03462436	02/13/02	\$1,805.00	08/21/02	Chhaim	Ry	McConell
03462436	02/13/02	\$1,585.00	08/21/02	Pin	Boeuk	McConell
03462436	02/13/02	\$1,620.00	08/26/02	Chhean	Sar	Culliney
03462436	02/13/02	\$175.00	08/28/02	Chantha	Bunthy	McConell
03462771	02/24/02	\$1,495.00	07/18/02	Phan	Savuth	McConell
03462771	02/24/02	\$1,726.00	07/18/02	So	Nheop	McConell
03462771	02/24/02	\$1,975.00	07/18/02	So	Paulika	McConell
03462771	02/24/02	\$2,356.00	07/18/02	So	Chertra	McConell
03462771	02/24/02	\$1,735.00	07/18/02	So	Phaectra	McConell
03468665	03/15/02	\$4,894.00	04/03/03	Mam	Sitha	McConell
03468665	03/15/02	\$4,431.00	04/03/03	Ngeth	Sitha	McConell
03468665	03/15/02	\$4,754.00	04/09/03	Ngeth	Samnang	McConell

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03468665	03/15/02	\$423.00	12/29/03	Ngeth	Sitha	McConell
03468725	03/18/02	\$2,030.00	07/15/02	Krapomroth	Khim	McConell
03468725	03/18/02	\$2,440.00	07/15/02	Sophay	Porth	McConell
03468725	03/18/02	\$2,000.00	07/15/02	Phoeun	Sam	Klug
03468725	03/18/02	\$345.00	07/24/02	Krapomroth	Khim	McConell
03468725	03/18/02	\$285.00	07/24/02	Sophay	Porth	McConell
03468725	03/18/02	\$460.00	10/22/02	Krapomroth	Khim	McConell
03468725	03/18/02	\$1,220.00	10/22/02	Sophay	Porth	McConell
03468725	03/18/02	\$886.00	01/02/04	Sophay	Porth	McConell
03469203	03/29/02	\$3,351.00	07/16/02	Ban	Kimsat	Culliney
03469203	03/29/02	\$1,515.00	10/10/02	Ban	Kimsat	Culliney
03469203	03/29/02	\$1,515.00	10/10/02	Ban	At	Culliney
03469203	03/29/02	\$210.00	06/19/03	Ban	Kimsat	Culliney
03469371	04/04/02	\$2,326.00	12/06/02	Vat	Savann	Unknown
03469510	04/07/02	\$349.00	01/17/03	Bun	Sakhan	Culliney
03469510	04/07/02	\$505.00	04/02/03	Ath	Tina	Unknown
03469757	04/15/02	\$1,290.00	04/02/03	Lay	Khon	Simpson
03469757	04/15/02	\$2,080.00	06/03/03	Lay	Khon	Simpson
03470054	04/19/02	\$4,411.00	12/07/02	Panya	Manila	Culliney
03470054	04/19/02	\$280.00	01/22/03	Panya	Manila	Culliney
03470054	04/19/02	\$210.00	02/01/03	Panya	Manila	Culliney
03470133	04/20/02	\$3,101.00	08/02/02	Meng	Bunkea	Culliney
03470133	04/20/02	\$1,901.00	08/02/02	Sim	Rockenna	McConell
03470133	04/20/02	\$1,868.00	02/14/03	Meng	Bunkea	Culliney
03464524	04/23/02	\$3,733.00	11/13/02	Seng	Melody	McConell
03464524	04/23/02	\$3,613.00	11/13/02	Seng	Jerry	Culliney
03464524	04/23/02	\$2,000.00	11/13/02	Sok	Mon	Culliney
03464524	04/23/02	\$2,000.00	05/21/03	Sok	Mon	Culliney
03465736	06/04/02	\$2,456.00	09/06/02	Kang	Chhang	Culliney
03465736	06/04/02	\$1,725.00	09/11/02	Phoun	Phala	McConell
03465736	06/04/02	\$1,521.00	09/20/02	Phoun	Phala	McConell
03465736	06/04/02	\$1,045.00	09/20/02	Kang	Chhang	Culliney
03465736	06/04/02	\$1,890.00	12/31/02	Kong	Chanda	Culliney
03465736	06/04/02	\$1,281.00	12/31/02	Kong	Chanda	Culliney
03465736	06/04/02	\$1,195.00	01/14/03	Phoun	Phala	McConell
03465736	06/04/02	\$525.00	01/14/03	Kong	Chanda	Culliney
03465736	06/04/02	\$1,135.00	01/14/03	Kang	Chhang	Culliney
03465736	06/04/02	\$530.00	02/26/04	Kong	Chanda	Culliney
03473966	07/15/02	\$1,883.00	09/23/02	Melo	Diane	Culliney
03473966	07/15/02	\$1,782.00	11/07/02	Melo	Diane	Culliney
03474153	07/18/02	\$4,794.00	01/22/03	Chhim	Phyrum	Culliney
03475016	08/03/02	\$2,321.00	10/07/02	Taing	Song	Culliney/McConnell
03475016	08/03/02	\$580.00	12/12/02	Taing	Song	Culliney/McConnell
03475016	08/03/02	\$220.00	01/15/03	Taing	Song	Culliney/McConnell
03475016	08/03/02	\$1,145.00	02/03/03	Taing	Song	Culliney/McConnell
03475016	08/03/02	\$210.00	02/03/03	Taing	Song	Culliney/McConnell
03475016	08/03/02	\$315.00	02/13/03	Taing	Song	Culliney/McConnell
03479077	09/07/02	\$2,835.00	01/13/03	Panya	Khanm	McConell
03479077	09/07/02	\$2,955.00	01/13/03	Phonphiphak	Kongkeo	Gill
03479077	09/07/02	\$495.00	01/24/03	Phonphiphak	Kongkeo	Gill
03485151	09/16/02	\$470.00	01/29/03	Soeun	Susie	Culliney
03485151	09/16/02	\$445.00	02/04/03	Soeun	Susie	Culliney
03485151	09/16/02	\$465.00	02/04/03	Soeun	Susie	Culliney
03485151	09/16/02	\$400.00	02/04/03	Phay	RON	Gill

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03485151	09/16/02	\$2,320.00	02/04/03	Phay	RON	Gill
03485151	09/16/02	\$140.00	02/04/03	Phay	RON	Gill
03485151	09/16/02	\$2,040.00	02/04/03	Soeun	Susie	Culliney
03485151	09/16/02	\$575.00	02/04/03	Phay	Ron	Gill
03485151	09/16/02	\$140.00	02/26/03	Phay	Ron	Gill
03485151	09/16/02	\$300.00	03/26/03	Phay	Ron	Gill
03485151	09/16/02	\$365.00	03/26/03	Phay	Ron	Gill
03485151	09/16/02	\$105.00	03/26/03	Phay	Ron	Gill
03485151	09/16/02	\$405.00	03/27/03	Soeun	Susie	Culliney
03485151	09/16/02	\$470.00	05/01/03	Soeun	Susie	Culliney
03485151	09/16/02	\$470.00	05/16/03	Soeun	Susie	Culliney
03485151	09/16/02	\$175.00	05/28/03	Soeun	Susie	Culliney
03479384	09/17/02	\$525.00	02/27/03	Meach	Melinda	McConell
03486571	09/18/02	\$235.00	01/07/03	Uy	Sovanna	McConell
03486571	09/18/02	\$1,768.00	01/22/03	Uy	Lath	McConell
03486571	09/18/02	\$2,030.00	01/24/03	Uy	Sovanna	McConell
03486571	09/18/02	\$235.00	02/10/03	Uy	Sovanna	McConell
03486571	09/18/02	\$185.00	02/10/03	Uy	Sovanna	McConell
03485991	10/02/02	\$325.00	01/27/03	Sok	Pheakley	McConell
03485991	10/02/02	\$260.00	01/27/03	Sok	Pheakley	McConell
03485991	10/02/02	\$465.00	01/27/03	Chan	Ly	McConell
03485991	10/02/02	\$280.00	01/27/03	Chan	Ly	McConell
03485991	10/02/02	\$210.00	02/04/03	Sok	Pheakley	McConell
03485991	10/02/02	\$2,615.00	02/04/03	Chan	Ly	McConell
03485991	10/02/02	\$1,920.00	02/04/03	Sok	Pheakley	McConell
03485991	10/02/02	\$190.00	02/11/03	Chan	Ly	McConell
03485991	10/02/02	\$260.00	03/27/03	Sok	Pheakley	McConell
03485991	10/02/02	\$300.00	03/27/03	Chan	Ly	McConell
03485991	10/02/02	\$495.00	03/31/03	Sok	Pheakley	McConell
03485991	10/02/02	\$460.00	05/08/03	Sok	Pheakley	McConell
03485991	10/02/02	\$420.00	08/29/03	Sok	Pheakley	McConell
03449560	10/05/02	\$815.00	02/18/03	Samith	Morn	McConell
03449560	10/05/02	\$1,615.00	05/01/03	Samith	Morn	McConell
03449560	10/05/02	\$1,400.00	05/05/03	Samith	Morn	McConell
03449560	10/05/02	\$530.00	07/01/03	Samith	Morn	McConell
03486642	10/16/02	\$440.00	01/15/03	Tith	Den	Culliney/McConnell
03486642	10/16/02	\$440.00	01/29/03	Tith	Den	Culliney/McConnell
03486642	10/16/02	\$2,270.00	01/31/03	Tith	Den	Culliney/McConnell
03486642	10/16/02	\$115.00	03/24/03	Tith	Den	Culliney/McConnell
03486642	10/16/02	\$415.00	03/24/03	Tith	Den	Culliney/McConnell
03486642	10/16/02	\$600.00	03/24/03	Tith	Den	Culliney/McConnell
03486642	10/16/02	\$420.00	03/24/03	Tith	Den	Culliney/McConnell
03486647	10/16/02	\$2,200.00	03/26/03	Lam	Vich	Culliney
03486647	10/16/02	\$720.00	03/26/03	Lam	Vich	Culliney
03486647	10/16/02	\$370.00	03/26/03	Lam	Vich	Culliney
03486647	10/16/02	\$250.00	03/26/03	Lam	Vich	Culliney
03486795	10/19/02	\$470.00	01/24/03	Yonn	Savonn	Portillo
03486795	10/19/02	\$440.00	02/10/03	Yonn	Savonn	Portillo
03486795	10/19/02	\$375.00	02/10/03	Yonn	Savonn	Portillo
03486795	10/19/02	\$2,770.00	02/26/03	Yonn	Savonn	Portillo
03486795	10/19/02	\$365.00	05/29/03	Yonn	Savonn	Portillo
03486795	10/19/02	\$175.00	06/24/03	Yonn	Savonn	Portillo
03487016	10/23/02	\$465.00	02/03/03	Phanthavong	Diane	Culliney
03487016	10/23/02	\$1,535.00	02/03/03	Phanthavong	Diane	Culliney

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03487016	10/23/02	\$510.00	02/03/03	Chum	Rida	Culliney
03487016	10/23/02	\$1,490.00	02/03/03	Chum	Rida	Culliney
03487016	10/23/02	\$895.00	02/26/03	Phanthavong	Diane	Culliney
03487016	10/23/02	\$710.00	02/26/03	Chum	Rida	Culliney
03487016	10/23/02	\$1,885.00	03/11/03	Phanthavong	Diane	Culliney
03487016	10/23/02	\$1,300.00	03/18/03	Chum	Rida	Culliney
03487016	10/23/02	\$645.00	04/08/03	Phanthavong	Diane	Culliney
03487016	10/23/02	\$645.00	05/19/03	Phanthavong	Diane	Culliney
03487016	10/23/02	\$645.00	05/19/03	Chum	Rida	Culliney
03487016	10/23/02	\$305.00	06/03/03	Jiraud	Christa	Culliney
03487193	10/26/02	\$2,040.00	01/27/03	Uy	Sophannee	Portillo
03487193	10/26/02	\$420.00	02/04/03	Uy	Sophannee	Portillo
03487193	10/26/02	\$365.00	02/04/03	Sam	Sakun	Portillo
03487193	10/26/02	\$1,526.00	03/27/03	Sam	Sakun	Portillo
03487193	10/26/02	\$365.00	06/02/03	Sam	Sakun	Portillo
03480962	11/18/02	\$2,345.00	02/05/03	Theng	Chea	McConell
03480962	11/18/02	\$2,255.00	04/18/03	Theng	Chea	McConell
03481235	11/27/02	\$1,910.00	02/17/03	Kong	Sally	Taylor
03481235	11/27/02	\$295.00	06/20/03	Kong	Sally	Taylor
03481722	12/12/02	\$480.00	07/13/04	Him	Saron	Culliney
03481722	12/12/02	\$210.00	07/13/04	Him	Saron	Culliney
03481722	12/12/02	\$1,830.00	07/13/04	Him	Saron	Culliney
03481722	12/12/02	\$175.00	08/25/04	Him	Saron	Culliney
03481654	12/13/02	\$505.00	02/26/03	Ngeth	Mao	McConell
03481654	12/13/02	\$585.00	03/31/03	Hem	Nhoeun	McConell
03481654	12/13/02	\$465.00	03/31/03	Hem	Nhoeun	McConell
03481654	12/13/02	\$2,115.00	03/31/03	Ngeth	Mao	McConell
03481654	12/13/02	\$510.00	03/31/03	Hem	Nhoeun	McConell
03481654	12/13/02	\$465.00	03/31/03	Ngeth	Mao	McConell
03481654	12/13/02	\$255.00	04/25/03	Ngeth	Mao	McConell
03490345	12/26/02	\$495.00	04/14/03	Mao	Rithy	Culliney
03490345	12/26/02	\$575.00	04/14/03	Mao	Rithy	Culliney
03490345	12/26/02	\$465.00	04/16/03	Mao	Rithy	Culliney
03490345	12/26/02	\$465.00	04/16/03	Mao	Rithy	Culliney
03490345	12/26/02	\$210.00	05/02/03	Mao	Rithy	Culliney
03490345	12/26/02	\$2,315.00	11/08/04	Mao	Rithy	Culliney
03482803	01/21/03	\$2,155.00	03/26/03	Veuk	Thavere	Klug
03482803	01/21/03	\$645.00	04/07/03	Veuk	Thavere	Klug
03482803	01/21/03	\$2,160.00	05/15/03	Veuk	Sareth	McConell
03482803	01/21/03	\$550.00	05/15/03	Veuk	Sareth	McConell
03482803	01/21/03	\$440.00	05/15/03	Veuk	Sareth	McConell
03482803	01/21/03	\$310.00	05/15/03	Veuk	Sareth	McConell
03482803	01/21/03	\$370.00	05/15/03	Veuk	Sareth	McConell
03482803	01/21/03	\$530.00	05/15/03	Veuk	Thavere	Klug
03482803	01/21/03	\$460.00	05/15/03	Veuk	Thavere	Klug
03482803	01/21/03	\$355.00	05/15/03	Veuk	Thavere	Klug
03482803	01/21/03	\$630.00	06/02/03	Veuk	Thavere	Klug
03482803	01/21/03	\$640.00	06/11/03	Veuk	Sareth	McConell
03482803	01/21/03	\$520.00	06/25/03	Veuk	Sareth	McConell
03482803	01/21/03	\$328.00	07/18/03	Veuk	Thavere	Klug
03482803	01/21/03	\$315.00	07/31/03	Veuk	Sareth	McConell
03482803	01/21/03	\$175.00	10/29/03	Veuk	Sareth	McConell
03482803	01/21/03	\$630.00	11/11/03	Veuk	Thavere	Klug

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03483246	02/07/03	\$390.00	05/15/03	Sims	Phath	Culliney/McConnell
03483246	02/07/03	\$630.00	05/23/03	Sims	Phath	Culliney/McConnell
03483246	02/07/03	\$490.00	06/20/03	Sims	Phath	Culliney/McConnell
03483246	02/07/03	\$457.00	11/28/03	Sims	Phath	Culliney/McConnell
03483246	02/07/03	\$1,699.00	11/28/03	Sims	Phath	Culliney/McConnell
03483246	02/07/03	\$534.00	11/28/03	Sims	Phath	Culliney/McConnell
03483838	02/14/03	\$2,000.00	04/21/03	Phlong	Sokean	McConell
03483838	02/14/03	\$1,795.00	05/14/03	Oeur	Brando	McConell
03483838	02/14/03	\$102.00	06/11/03	Phlong	Sokean	McConell
03483838	02/14/03	\$1,465.00	11/06/03	Phlong	Sokean	McConell
03483838	02/14/03	\$1,083.00	04/19/04	Oeur	Brando	McConell
03500338	03/24/03	\$550.00	07/17/03	Rom	Jimmy	Culliney
03500338	03/24/03	\$400.00	07/17/03	Liv	Kong	McConell
03500338	03/24/03	\$210.00	07/22/03	Rom	Jimmy	Culliney
03500338	03/24/03	\$328.00	07/22/03	Liv	Kong	McConell
03500338	03/24/03	\$1,993.00	10/13/03	Liv	Kong	McConell
03500338	03/24/03	\$350.00	10/13/03	Liv	Kong	McConell
03500338	03/24/03	\$328.00	10/13/03	Liv	Kong	McConell
03500338	03/24/03	\$1,705.00	10/22/03	Rom	Jimmy	Culliney
03500338	03/24/03	\$1,705.00	02/19/04	Rom	Jimmy	Culliney
03500338	03/24/03	\$1,740.00	02/25/04	Rom	John	Culliney
03500338	03/24/03	\$320.00	02/25/04	Rom	John	Culliney
03500338	03/24/03	\$1,740.00	03/10/04	Rom	John	Culliney
03500338	03/24/03	\$320.00	03/10/04	Rom	John	Culliney
03500623	03/28/03	\$1,428.00	05/29/03	Phal	Channak	Culliney
03500623	03/28/03	\$24.00	12/15/03	Phal	Channak	Culliney
03500623	03/28/03	\$24.00	06/16/04	Phal	Channak	Culliney
03491088	04/15/03	\$770.00	01/22/04	Uy	Sophannee	Portillo
03491823	05/23/03	\$1,362.00	10/29/03	Rom	John	Culliney
03504357	06/03/03	\$1,635.00	08/27/03	Sem	Sokhan	mcConell
03504357	06/03/03	\$1,553.00	08/27/03	Sem	Chantha	Culliney
03504357	06/03/03	\$2,000.00	08/27/03	Sem	Sakhoeui	Culliney
03504357	06/03/03	\$460.00	09/02/03	Toch	Reath	Culliney
03504357	06/03/03	\$2,060.00	09/02/03	Toch	Reath	Culliney
03504357	06/03/03	\$575.00	09/02/03	Dam	Channar	McConell
03504357	06/03/03	\$1,860.00	09/04/03	Dam	Channar	mcConell
03504357	06/03/03	\$371.00	09/08/03	Sem	Sokhon	Culliney
03504357	06/03/03	\$317.00	09/08/03	Toch	Reath	Culliney
03504357	06/03/03	\$384.00	09/23/03	Toch	Reath	Culliney
03504357	06/03/03	\$371.00	09/23/03	Sem	Sokhon	Culliney
03504357	06/03/03	\$391.00	09/23/03	Dam	Channar	McConell
03504357	06/03/03	\$140.00	10/13/03	Dam	Channar	McConell
03504357	06/03/03	\$430.00	10/20/03	Sem	Sokhom	McConell
03504357	06/03/03	\$317.00	10/30/03	Toch	Reath	Culliney
03504357	06/03/03	\$177.00	11/05/03	Sem	Sokhon	McConell
03504357	06/03/03	\$442.00	11/11/03	Sem	Sokhom	McConell
03504357	06/03/03	\$280.00	11/13/03	Toch	Reath	Culliney
03504357	06/03/03	\$282.00	11/13/03	Dam	Channar	McConell
03504357	06/03/03	\$70.00	11/21/03	Sem	Sokhom	McConell
03504357	06/03/03	\$1,880.00	11/21/03	Sem	Sakhoeui	Culliney
03504357	06/03/03	\$2,447.00	11/21/03	Sem	Chantha	Culliney
03504357	06/03/03	\$1,540.00	11/21/03	Sem	Sokhan	Culliney
03504357	06/03/03	\$214.00	12/09/03	Sem	Sakhoeui	Culliney
03504357	06/03/03	\$210.00	12/11/03	Dam	Channar	McConell

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03504357	06/03/03	\$107.00	04/27/04	Toch	Reath	Culliney
03504357	06/03/03	\$802.00	10/25/04	Dam	Channar	McConell
03504357	06/03/03	\$671.00	11/08/04	Toch	Reath	Culliney
03504615	06/07/03	\$1,140.00	07/16/03	Kmsan	Mom	McConell
03504615	06/07/03	\$605.00	09/05/03	Chea	Vannak	McConell
03504615	06/07/03	\$284.00	09/10/03	Chea	Vannak	McConell
03504615	06/07/03	\$544.00	09/22/03	Chea	Vannak	McConell
03504615	06/07/03	\$252.00	09/29/03	Chea	Vannak	McConell
03504615	06/07/03	\$177.00	10/17/03	Chea	Vannak	McConell
03504615	06/07/03	\$1,932.00	11/10/03	Chea	Vannak	McConell
03504615	06/07/03	\$420.00	11/13/03	Chea	Vannak	McConell
03506013	06/12/03	\$2,520.00	09/16/04	Eang	Sokunth	Culliney
03505976	06/28/03	\$1,434.00	02/23/04	Keo	Kothatom	McConell
03505976	06/28/03	\$1,900.00	04/14/04	Phanthanousinh	Vantp	Culliney
03506712	07/11/03	\$2,000.00	09/15/03	Rom	John	Culliney
03506712	07/11/03	\$1,870.00	09/17/03	Liv	Kong	McConell
03506712	07/11/03	\$130.00	10/03/03	Liv	Kong	McConell
03506712	07/11/03	\$349.00	02/17/04	Liv	Kong	McConell
03506712	07/11/03	\$901.00	02/17/04	Rom	John	Culliney
03510448	07/26/03	\$441.00	11/21/03	Sambath	Kim	McConell
03510448	07/26/03	\$321.00	11/21/03	Eang	Sophannar	McConell
03510448	07/26/03	\$107.00	12/10/03	Eang	Sophannar	McConell
03510448	07/26/03	\$247.00	12/10/03	Sok	Samnang	Culliney
03510448	07/26/03	\$105.00	12/15/03	Sok	Samnang	Culliney
03510448	07/26/03	\$2,961.00	12/16/03	Sambath	Kim	McConell
03510448	07/26/03	\$225.00	01/30/04	Sambath	Kim	McConell
03510448	07/26/03	\$105.00	06/16/04	Sok	Samnang	Culliney
03510448	07/26/03	\$2,961.00	06/16/04	Sambath	Kim	McConell
03510448	07/26/03	\$225.00	08/04/04	Sambath	Kim	McConell
03508820	08/12/03	\$610.00	07/09/04	Mam	Katherine	McConell
03508820	08/12/03	\$1,478.00	07/09/04	Nuth	Kim	McConell
03508820	08/12/03	\$846.00	09/10/04	Nuth	Linda	McConell
03508820	08/12/03	\$1,080.00	09/10/04	Mam	Katherine	McConell
03511086	09/18/03	\$277.00	01/16/04	Samith	Morin	McConell
03511086	09/18/03	\$277.00	01/16/04	Samith	Morin	McConell
03511086	09/18/03	\$531.00	01/16/04	Samith	Morin	McConell
03511086	09/18/03	\$1,557.00	01/16/04	Samith	Morin	McConell
03511086	09/18/03	\$415.00	02/19/04	Samith	Morin	McConell
03511086	09/18/03	\$887.00	03/10/04	Samith	Morin	McConell
03511086	09/18/03	\$1,674.00	09/22/04	Suon	Thea	McConell
03511086	09/18/03	\$2,830.00	10/22/04	Suon	Thea	McConell
03513997	10/27/03	\$862.00	06/01/04	Peov	Kan	McConell
03513997	10/27/03	\$2,287.00	06/01/04	Rath	Chareth	Unknown
03513997	10/27/03	\$862.00	06/01/04	Rath	Kristina	McConell
03513997	10/27/03	\$2,302.00	06/04/04	Phan	Saleen	McConell
03513997	10/27/03	\$867.00	06/04/04	Khiaosoth	Vong	McConell
03514331	11/07/03	\$1,490.00	11/09/04	Phim	Chhat	McConell
03493502	12/08/03	\$2,000.00	10/05/04	Melo	Diane	Culliney
03493502	12/08/03	\$837.00	12/13/04	Melo	Diane	Culliney
03530556	12/10/03	\$1,016.00	04/28/04	Truong	Ken	Klug
03530556	12/10/03	\$1,123.00	04/28/04	Truong	Ken	Klug
03530556	12/10/03	\$297.00	04/28/04	Truong	Ken	Klug
03532353	01/02/04	\$478.00	06/23/04	Song	Pat	Blake/Klug
03532767	01/10/04	\$1,740.00	04/12/04	Delavalle	Robert	McConell

Chart 3:
Damages Chart

Claim Number	DOL	Target Amt Pd	T Date	Last	First	Provider
03532767	01/10/04	\$2,525.00	04/12/04	Molina	Demetri	McConnell
03532767	01/10/04	\$2,385.00	04/12/04	Carrasquillo	Alma	McConnell
03532767	01/10/04	\$1,740.00	10/13/04	Delavalle	Robert	McConnell
03533438	01/19/04	\$1,310.00	03/23/04	Inthabane	Michael	Klug
03536789	03/16/04	\$665.00	07/08/04	Vong	Savy	Klug
03536789	03/16/04	\$1,057.00	12/03/04	Vong	Savy	Klug
03536789	03/16/04	\$278.00	12/03/04	Vong	Savy	Klug
03540127	05/14/04	\$989.00	08/18/04	Sok	Sam	McConnell/Blake
03540127	05/14/04	\$309.00	10/06/04	Sok	Sam	McConnell/Blake
TOTAL:		\$625,386.00				